



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF  
CALIFORNIA**

**FILED**

07-13-12  
04:59 PM

Order Instituting Rulemaking to Evaluate  
Telecommunications Corporations Service Quality  
Performance and Consider Modifications to Service  
Quality Rules

R.11-12-001

**MOTION OF THE UTILITY REFORM NETWORK  
FOR LEAVE TO FILE UNDER SEAL: REPLY TO RESPONSES FILED IN  
RESPONSE TO THE ADMINISTRATIVE LAW JUDGE'S RULING  
REQUIRING TELECOMMUNICATIONS CORPORATIONS TO PROVIDE  
DATA**

July 13, 2012

William R. Nusbaum  
Managing Attorney  
[bnusbaum@turn.org](mailto:bnusbaum@turn.org)

The Utility Reform Network  
115 Sansome St., Suite 900  
San Francisco, CA 94104  
Tel: 415/929-8876, ext. 309  
Fax: 415/929-1132

Pursuant to Rule 11.4 of the Commission's Rules of Practice and Procedure The Utility Reform Network (TURN) respectfully submit this Motion for leave to file under seal the Reply to Responses Filed in Response to the Administrative Law Judge's Ruling Requiring Telecommunications Corporations to Provide Data (Reply) filed concurrently with this Motion in the above-captioned docket.

The confidential reply contains information that has been deemed confidential by the certain parties in this proceeding, and was provided to TURN pursuant to a non-disclosure agreement executed by TURN and AT&T and TURN and Verizon. Such confidential information is protected under General Order 66-C and therefore is not subject to public disclosure. TURN requests that the Commission adopt the Proposed Order.

Granting this Motion will not impair the rights of any party. TURN will serve the Reply on those individuals at the Commission who are entitled to receive confidential information under General Order 66-C and on those parties, as appropriate, who signed the nondisclosure agreement applicable to this proceeding. In addition, TURN has prepared a public version of the Reply from which all confidential information has been redacted. This public version is being filed with the Commission and will be served on all parties to this proceeding who have not executed the nondisclosure agreement.

Respectfully submitted,

\_\_\_\_\_/S/\_\_\_\_\_

William R. Nusbaum  
Managing Attorney

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF  
CALIFORNIA**

Order Instituting Investigation to Evaluate Telecommunications Corporations Service Quality Performance and Consider Modifications to Service Quality Rules
--

R.11-12-001

**[PROPOSED] RULING**

In accordance with its Rules of Practice and Procedure, the California Public Utilities Commission (“Commission”) has considered the **MOTION OF TURN FOR LEAVE TO FILE UNDER SEAL CONFIDENTIAL MATERIALS IN ITS COMMENTS**

The Commission hereby ORDERS as follows:

1. The Motion of TURN is granted.

Dated \_\_\_\_\_, 2012 at San Francisco, California

\_\_\_\_\_  
Administrative Law Judge