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April 12, 2002

Secretary of the Commission
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Re: Case No. _____

Dear Judge Roberts:

Enclosed for filing with the Commission in the above-referenced case is an original and eight copies of Southwestern Bell Telephone Company's Motion requesting authorization to file a portion of its Year 2001 Annual Report under seal. Please stamp "Filed" on the extra copy of the Motion and return the copy to me in the enclosed self-addressed, stamped envelope.

Also with this letter, we are submitting Southwestern Bell's Year 2001 Annual Report in the following formats: one copy of the redacted Non-proprietary ("NP") version for the public; and an original and eight copies of the Highly Confidential ("HC") version (in sealed envelopes).

If anyone from Staff has questions regarding the contents of Southwestern Bell's Annual Report, please have them call our Associate Director-Regulatory Accounting, Connie Wepfer, at (314) 235-5648. Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

A handwritten signature in dark ink, appearing to read "Leo J. Bub", written in a cursive style.

Leo J. Bub

Enclosure

cc: Mr. Dana Joyce
Mr. Michael Dandino
Ms. Connie Wepfer

Southwestern Bell Telephone Company's)
 Motion for Permission to File a Portion of its) Case No. _____
 Annual Report Under Seal.)

Southwestern Bell Telephone Company¹, pursuant to 4 CSR Section 240-10.080(7), respectfully moves the Missouri Public Service Commission (“Commission”) for permission to file Schedule 10 from its Annual Report (which requires carriers to provide the number of access lines by exchange) under seal and classified as “Highly Confidential.” In support of its Motion, Southwestern Bell states:

1. Schedule 10 of the Commission’s Annual Report now requires each incumbent local exchange carrier (“LEC”) to report the number of access lines, by exchange, it has in the state, categorized into three general line types: Business (pure resale, UNE, UNE-P and full facility based, or company-provided), Residence (pure resale, UNE, UNE-P and full facility based, or company-provided) and Public (public and customer-owned).

2. Access line information provided at this level of geographical detail is very competitively sensitive. Specifically, it would reveal the number of access lines a carrier has provided on a very specific and localized geographic basis. Accordingly, this information falls squarely within Section A(3) of the “Highly Confidential”

¹ Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company is referred to in this filing as either “Southwestern Bell” or “SWBT”.

classification of the Commission's Standard Protective Order: "market-specific information relating to services offered in competition with others."

3. This exchange specific market-share information is closely guarded by incumbent LECs. If made public, this type of information would make carriers more vulnerable to the marketing efforts of their competitors. As a result, access line information at the exchange level of detail is kept confidential by carriers in the industry and is not available to the public in any format.

4. Although Southwestern Bell proposes to file this information with the Commission under seal, it would still be available to the Commission and its Staff, as well as the Office of Public Counsel.

5. Following a recent Staff investigation and a Staff-sponsored industry conference on the Annual Report process, Staff agreed that confidential treatment was appropriate for access line data reported at the wire center level in the Annual Report and recommended that confidential treatment be granted:

"the Staff now agrees that the wire center level access line information not otherwise publicly available need not be made publicly available through the Annual Report submissions...Staff recommends that the Commission should allow SWBT to submit the information SWBT designates as proprietary on a confidential basis."²

Access line data at an exchange level is similarly not publicly available and should be afforded the same confidential treatment, especially in light of the new disaggregation requirements.

6. Based on this Staff recommendation, the Commission found good cause to permit Southwestern Bell to file its access line information in its year 2000 Annual Report under seal.³ This approach is consistent with how the Commission has traditionally handled the production of

² See Staff recommendation filed October 9, 2001 in Case No. TE-2001-520, at p. 3.

³ Order Granting Confidential Treatment, Case No. TE-2001-520, issued December 4, 2001 at p. 3.

confidential information within an Annual Report and would also be appropriate here. Southwestern Bell therefore requests permission to submit the exchange level access line information reported in Schedule 10 of the Commission's Annual Report under seal and that it be classified as "Highly Confidential."

WHEREFORE, Southwestern Bell respectfully requests the Commission to grant authorization under 4 CSR 240-10.080(7) for Schedule 10 of its Annual Report to be filed and maintained under seal as "Highly Confidential" information.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

By

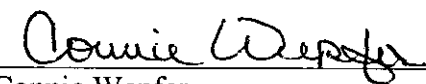

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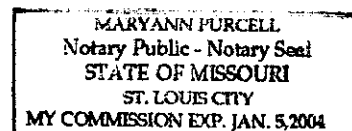
VERIFICATION

I certify that the information contained in this Motion is true and correct to the best of my knowledge, information and belief.

April 10, 2002
Date


Connie Wepfer
Associate Director - Regulatory Accounting

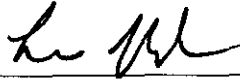
My Commission Expires: Jan. 5, 2004



CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by overnight delivery on

April 12, 2002.

A handwritten signature in dark ink, appearing to read 'Leo J. Bub', is written over a horizontal line.

Leo J. Bub

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