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June 11, 2002

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re: Case No. TR-2001-65

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc. and TCG Kansas City, Inc.'s Motion to Suspend Procedural Schedule Pending Resolution of Dispute Over Access to Cost Studies.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Rebecca B. DeCook yes".

Rebecca B. DeCook

Attachment

cc: All Parties of Record



Recycled Paper

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Access Rates Charged)	
by Competitive Local Exchange)	Case No. TP-2001-65
Telecommunications Companies in the)	
State of Missouri)	

**MOTION TO SUSPEND PROCEDURAL SCHEDULE PENDING RESOLUTION
OF DISPUTE OVER ACCESS TO COST STUDIES**

COMES NOW, AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc. and TCG Kansas City, Inc. (collectively named "AT&T" or the "AT&T Companies") by and through its undersigned counsel, and for its Motion to Suspend Procedural Schedule Pending Resolution of Dispute Over Access to Cost Studies states as follows:

Syllabus

In this motion, AT&T requests the Commission suspend the procedural schedule in this proceeding until the issue relating to modification of the legacy Protective Order to allow access to highly confidential information by internal experts is resolved. Under the current procedural schedule, direct testimony in this proceeding is to be filed on July 1, 2002. However, because of the limitations imposed by the current Protective Order, AT&T's internal experts have been and continue to be unable to review any cost studies, including the results purported to represent AT&T's costs of providing switched access in Missouri. This lack of access to information prohibits AT&T from developing its case and violates its due process rights. For these reasons, AT&T requests the current procedural be suspended until these issues are resolved.

Procedural Background

On May 3, 2002, AT&T filed a motion requesting the Missouri Public Service Commission adopt a modified protective order, which would permit AT&T's internal experts to review information designated as Highly Confidential (HC). This would include the studies and results produced by Staff's consultant, which to date, AT&T could not provide to its internal experts for review and analysis. On May 13, 2002 Southwestern Bell Telephone Company (SWBT) and the Small Telephone Company Group filed separate responses opposing AT&T's request. On that

same day, the Staff of the Missouri Public Service Commission filed a response in support of AT&T's request. On May 22, 2002, SWBT filed a reply to Staff's response and on May 23, 2002, AT&T and Staff filed separate responses to SWBT's May 13, 2002 response.

Request for Suspension of Procedural Schedule

1. Since there has already been several rounds of pleadings on AT&T's Motion to Modify, AT&T will not reiterate those arguments again. However, because the issue of access to HC information has not been resolved, AT&T's internal experts are still unable to review any of Staff's draft cost studies or results, including those that are purported to reflect the AT&T Companies' switched access costs in Missouri. Under the proposed procedural schedule, direct testimony is due to be filed on July 1, 2002. Absent access by internal experts to this critical information, AT&T cannot even begin to analyze Staff's estimates, much less prepare its own direct case and be ready to file testimony in approximately 20 calendar days. Even if AT&T's request for a modified protective order were granted immediately, AT&T would be unable to prepare any meaningful direct testimony by July 1, 2002.

2. For these reasons, AT&T requests the Commission suspend the procedural schedule until the protective order issues have been fully resolved and AT&T's internal experts are able to review information designated as HC. Failure to suspend the procedural schedule will deny AT&T the opportunity to fully participate in this proceeding and will also violate AT&T's due process rights because AT&T is unable to analyze and assess the credibility of Staff's cost estimates.

3. If the Commission adopts the protective order proposed by AT&T, the Commission recommends the existing procedural schedule be modified such that Direct Testimony would be due 45 days from the date the modified protective order is adopted.

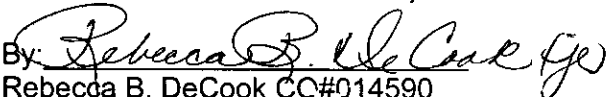
The existing time intervals between the events set forth in the existing procedural schedule could be maintained, with new dates established accordingly. If there are scheduling conflicts, AT&T believes the parties can agree to modify such conflicting dates as necessary. In the event the Commission declines to adopt the protective order proposed by AT&T, AT&T requests the Commission not reinstate the procedural schedule until all non-disclosure agreements have been negotiated or further litigated and all issues surrounding the access by internal experts of Highly Confidential cost study information have been resolved among all of the parties.

4. Prior to filing this motion, AT&T attempted to contact the parties that have filed legal representation in this case. While AT&T did not receive responses from all parties, AT&T can state that the Office of Public Counsel, the Missouri Independent Telephone Company Group, the Small Telephone Company Group, and Sprint Missouri, Inc., indicated they were not opposed to AT&T's request.

WHEREFORE, for the reasons described above, AT&T respectfully requests the Commission issue an Order suspending the procedural schedule in this case.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
THE SOUTHWEST, INC., TCG ST. LOUIS,
INC. AND TCG KANSAS CITY, INC.**

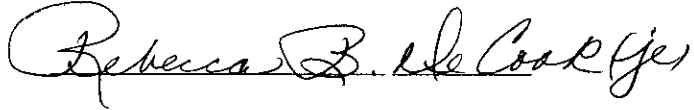
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CERTIFICATE OF SERVICE BY MAIL

A true and correct copy of the foregoing in Docket TR-2001-65 was served upon the parties identified on the following service list on this 11th Day of June, 2002 by either hand delivery or via U.S. Mail.



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Network Communications
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Sullivan, MO 63080

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Choctaw Communications d/b/a Smoke
Signal Communications
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