One Bell Center Room: 3516 St. Louis, MO 63101 Phone: 314.235.6060

Phone: 314.235.6060 Fax: 314.247.0014 anthony.conroy@sbc.com Southwestern Bell

December 5, 2002

TO: UNREPRESENTED PARTIES IN CASE NO. TR-2001-65:

Pursuant to the Missouri Public Service Commission's March 14, 2002, Order

Adopting Procedural Schedule, Clarifying The Scope of This Proceeding, and Concerning

Motion to Waive Service Requirement and Motion to Compel Discovery, Southwestern Bell

Telephone Company hereby notifies parties not represented by counsel that filed its Response

To AT&T Communications of the Southwest, Inc., TCG St. Louis, and TCG Kansas City,

Inc.'s Motion of AT&T to Classify Hearing Exhibit 54 as a Public Document. Any

unrepresented party may obtain a copy of this pleading upon request at no cost.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

/s/ Anthony K. Conroy

Anthony K. Conroy

Enclosures

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of an Investigation of the Actual Costs)	
Incurred in Providing Exchange Access Service and)	
The Access Rates to be Charged by Competitive Local)	Case No. TR-2001-65
xchange Telecommunications Companies in the)	
State of Missouri.		

SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE TO AT&T COMMUNICATIONS OF THE SOUTHWEST, INC., TCG ST. LOUIS, AND TCG KANSAS CITY, INC.'S MOTION OF AT&T TO CLASSIFY HEARING EXHIBIT 54 AS A PUBLIC DOCUMENT

COMES NOW Southwestern Bell Telephone L.P., d/b/a Southwestern Bell Telephone Company (SWBT), and for its Response to AT&T Communications of the Southwest, Inc., TCG St. Louis and TCG Kansas City, Inc.'s (AT&T's) Motion to Classify Hearing Exhibit 54 as a Public Document (Motion to Declassify), states to the Missouri Public Service Commission (Commission) as follows:

- 1. At the hearing in this case, Exhibit 54 (consisting of certain work papers of AT&T witness Michael Pauls) was offered into evidence by the Small Telephone Company Group. Exhibit 54 was admitted into evidence, and the exhibit was provisionally marked as "Highly Confidential" (or HC) as defined in the Commission's standard protective order, which the Commission previously adopted in this case. The exhibit was marked as HC due to several parties' concerns regarding the potentially sensitive nature of some of the information contained in Exhibit 54 (e.g., company-specific statewide intrastate access revenue, composite access rates, and statewide access minutes of use).
- 2. SWBT has reviewed the information contained in Exhibit 54, as well as the highly confidential information that was provided by SWBT and other parties to the Commission Staff in the technical workshops conducted in Case No. TO-98-329. SWBT has also reviewed the

reformatted information provided by Staff to the parties in connection with the technical workshops in Case No. TO-98-329. SWBT continues to have serious concerns regarding the disclosure and usage of highly confidential and proprietary information provided by several parties, including SWBT, solely to facilitate meaningful discussions at the workshops conducted by the Commission Staff in Case No. TO-98-329, outside the context of those workshops. In this situation, however, SWBT does not object to the Commission removing the "Highly Confidential" classification of Exhibit 54 that was made at the hearing in this case.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

By: Unithough

PAUL G. LANE #27011 LEO J. BUB #34326

ANTHONY K. CONROY #35199 MIMI B. MACDONALD #37606

Attorneys for Southwestern Bell Telephone, L.P.

One SBC Center, Room 3516

St. Louis, Missouri 63101

314-235-6060 (Telephone)

314-247-0014 (Facsimile)

anthony.conroy@sbc.com

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of this document was served on all counsel or record by first-class, postage prepaid, U.S. Mail or via hand-delivery on December 5, 2002.

Anthony K. Conroy

Michael Dandino Office of the Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Craig S. Johnson Andereck/Evans/Milne, et al. 301 E. McCarty St., P.O. Box 1438 Jefferson City, MO 65102

Sheldon K. Stock Greensfelder, Hemker & Gale, P.C. 10 S. Broadway, Suite 2000 St. Louis, MO 63102

Carol Keith Gabriel Communications of Missouri 16090 Swingley Ridge Rd, Ste 500 Chesterfield, MO 63017

James M. Fischer/Larry W. Dority Fischer & Dority 101 Madison St., Suite 400 Jefferson City, MO 65101

Cathleen Martin Newman, Comley and Ruth 601 Monroe St., Ste. 301 Jefferson City, MO 65102 Dan Joyce Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Mary Ann Carr Young P.O. Box 104595 Jefferson City, MO 65110-4595

Carl J. Lumley/Leland B. Curtis Curtis, Oetting, Heinz, et al. 130 S. Bemiston, Suite 200 St. Louis, MO 63105

Paul H. Gardner Goller, Gardner & Feather 131 East High Street Jefferson City, MO 65101

J. Steve Weber AT&T Communications of Southwest 101 W. McCarty, Suite 216 Jefferson City, MO 65101 Thomas R. Parker GTE Midwest Inc. d/b/a Verizon 605 Monroe Street, Suite 304 Jefferson City, MO 65101

Brian T. McCartney/W.R. England II Brydon, Swearengen & England PC 312 E. Capitol Ave., P.O. Box 456 Jefferson City, MO 65102-0456

Stephen F. Morris MCI Telecommunications Corp. 701 Brazos, Suite 600 Austin, TX 78701

Lisa C. Hendricks, Esq. 6450 Sprint Parkway, Bldg 14 Mail Stop KSOPHN0212-2A253 Overland Park, KS 66251

Rebecca B. DeCook AT&T Communications of Southwes 1875 Lawrence Street, Suite 1575 Denver, CO 80202