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April 17, 2000

HAND DELIVERED

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Room 530
Truman State Office Building
Jefferson City Missouri 65101

FILED²

APR 17 2000

Missouri Public
Service Commission

Re: **In the Matter of the 1999 Annual Report of AT&T
Communications of the Southwest, Inc.**

TE-2000-657

Dear Secretary Roberts:

Enclosed for filing in the above-referenced case please find the following:

**Original and 14 copies of Request to File Business and Financial
Information in Annual Report Under Seal and For Extension of
Time for Filing Annual Report**

If you have any questions concerning the above, please contact me.

Sincerely,

LATHROP & GAGE L.C.

By:

Kurt U. Schaefer

cc: Dennis L. Frey
Michael F. Dandino
Office of Public Counsel

FILED³

APR 17 2000

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the 1999 Annual Report of)
AT&T Communications of the)
Southwest, Inc.)

Case No. TE-2000-657

**REQUEST TO FILE BUSINESS AND FINANCIAL INFORMATION
IN ANNUAL REPORT UNDER SEAL AND FOR EXTENSION OF TIME FOR
FILING ANNUAL REPORT**

Comes now AT&T Communications of the Southwest, Inc., ("AT&T"), and hereby request confidential treatment of its 1999 annual report and requests an extension of time to file its 1999 annual report. In support of its request, AT&T states as follows:

1. Pursuant to 4 CSR 240-10.080(4), AT&T is required to file its Alternative Basic Local Exchange Carrier Annual Report ("annual report") with this Commission.

2. AT&T requests that all portions of the annual report containing statements of the number of Missouri access lines that it serves (hereafter "business information") and statements of cash flows, balance sheets, and income statements (hereafter "financial information"), be filed and maintained with this Commission under seal as a proprietary document.

3. 4 CSR 240-10.080(7) states:

Where a utility subject to this rule considers the information requested on the annual report form to be confidential, it must make a written request to the executive secretary to file that information under seal and state good cause for maintaining the information under seal. The executive secretary shall then, through the general counsel, present that request to the commission for approval.

(emphasis added).

4. AT&T has good cause to request that the business and financial information in the annual report be filed and maintained under seal, in that AT&T considers the business

and financial information confidential. *See Affidavit of R. Matthew Kohly ("Affidavit") attached hereto and fully incorporated herein.*

5. Public disclosure of the business and financial information would be competitively harmful to AT&T. *Affidavit.*

6. AT&T is a competitive local exchange company and is providing competitive telecommunications services in Missouri. *Affidavit.*

7. The public disclosure of the business and financial information at a state specific level would allow AT&T's competitors to determine the extent of AT&T's business operations. *Affidavit.*

8. The business and financial information could be used by competitors to determine the extent of AT&T's network facilities, operating expenses, revenues, customer base, and other competitively sensitive information to the detriment of AT&T. *Affidavit.*

9. The business and financial information contained in the annual report is not publicly available. *Affidavit.*

10. The Commission has previously granted similar requests of AT&T's affiliates to treat as confidential statements of cash flows, balance sheets, and income statements contained in annual reports in cases TO-99- 481 and TO-99- 482.

11. AT&T requests that Commission grant AT&T an extension of time to file its annual report, pursuant to 4 CSR 240-10.080(8), until such time as the Commission can consider AT&T's request to file the annual report under seal.

WHEREFORE, AT&T requests that all portions of the annual report containing statements of the number of Missouri access lines that it serves, "business information," and statements of cash flows, balance sheets, and income statements, "financial information," be

filed and maintained with this Commission under seal as a proprietary document pursuant to 4 CSR 240-10.080(7), that the Commission grant AT&T an extension of time to file the annual report until such time as the Commission can consider AT&T's request to file the annual report under seal pursuant to 4 CSR 240-10.080(8), and for such other relief as deemed necessary to protect the confidentiality of the annual report.

Respectfully submitted,



Paul S. DeFord Mo. #29509

✓ Kurt U. Schaefer Mo. #45829

LATHROP & GAGE, L.C.

2345 Grand Boulevard

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Kansas City, Missouri 64108

Telephone: 816-292-2000

Facsimile: 816-292-2001

Counsel for AT&T Communications
of the Southwest, Inc.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, postage prepaid, to all counsel of record as shown on the following service list this 17th day of April, 2000.

Dennis L. Frey
Assistant General Counsel
MO Public Service Commission Staff
P.O. Box 360
Jefferson City, MO 65102

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65105

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



Kurt U. Schaefer

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the 1999 Annual Report of)
AT&T Communications of the) Case No. _____
Southwest, Inc.)

AFFIDAVIT OF R. MATTHEW KOHLY

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, R. Matthew Kohly, being duly deposed and sworn, state the following to the best of my personal knowledge and/or belief:

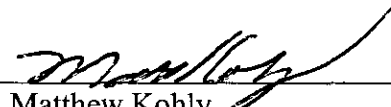
1. My name is R. Matthew Kohly. My business address is 101 West McCarty Street, Jefferson City, Missouri 65101.
2. I am employed by AT&T in its Law and Government Affairs organization as a Regulatory Manager - Government Affairs.
3. The annual report required to be filed by AT&T with the Public Service Commission under 4 CSR 240-10.080(4) contains sensitive business information, specifically statements of the number of Missouri access lines that AT&T serves, and sensitive financial information, specifically statements of cash flows, balance sheets, and income statements, that AT&T considers confidential.
4. Public disclosure of the business and financial information in the annual report would be competitively harmful to AT&T.
5. AT&T is a competitive local exchange company and is providing competitive telecommunications services in Missouri.

6. The public disclosure of the business and financial information in the annual report at a state specific level would allow AT&T's competitors to determine the extent of AT&T's business operations.

7. The business and financial information in the annual report could be used by competitors to determine the extent of AT&T's network facilities, operating expenses, revenues, customer base, and other competitively sensitive information to the detriment of AT&T.


8. The business and financial information contained in the annual report is not publicly available.

Further affiant sayeth naught.



R. Matthew Kohly

Subscribed and sworn to before me this 17th day of April, 2000.



Notary Public
Cole County, Missouri

My Commission expires:

3/26/2003

