

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Southwestern Bell Telephone,)	
L.P. d/b/a SBC Missouri's Proposed Revision)	Case No. TT-2004-0542
to its PSC MO. NO. 36 Access Services)	Tariff No. JI-2004-1159

AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.'S MOTION FOR PROTECTIVE ORDER

COMES NOW, AT&T Communications of the Southwest, Inc. ("AT&T") and moves the Missouri Public Service Commission ("Commission") for entry of a standard protective order in the above-captioned case. In support thereof, AT&T states as follows:

1. On June 15, 2004, SBC Missouri served on AT&T certain data requests, which seek proprietary or highly confidential business information. In addition, AT&T anticipates that some of the testimony that will be provided at the hearing in this proceeding may address proprietary and highly confidential information. In accordance with 4 CSR 240-2.085, and in order to facilitate the exchange of highly confidential and proprietary information, AT&T hereby requests the Commission to issue its standard protective order in this proceeding. The confidential information at issue and that which AT&T contemplates could be discussed at the hearing in this proceeding is competitively sensitive and strategic business information whose disclosure could harm AT&T's competitive position and strategic relationships. None of the information for which a claim of confidentiality is made can be found in any format in any other public document. AT&T requests the Commission to issue its standard protective order, in the same form as has been customary in previous cases.

2. AT&T notes that the Commission has issued this standard protective order in numerous other dockets where it has recognized a genuine need to protect confidential information from inappropriate disclosure. The issuance of its standard protective order in prior proceedings has helped to minimize disputes, and has provided a sound method for parties to submit confidential information.

WHEREFORE, for the reasons set forth herein, AT&T respectfully requests the Commission to issue its standard protective order in this proceeding, in the same form as has been customary in previous cases.

Respectfully submitted this 13th day of July, 2004.

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**ATTORNEYS FOR AT&T
COMMUNICATIONS OF THE
SOUTHWEST, INC.**

CERTIFICATE OF SERVICE

(Case No. TT-2004-0542)

I certify that copies of AT&T's Motion for Protective Order were served on the following by e-mail on July 13, 2004.

Rebecca B. DeLoak by DR#

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