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June 5, 2002

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

Re: Case No.

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc 's, Request to File Business and Financial Information in Annual Report Under Seal and for Extension of Time for Filing Annual Report..

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

Very truly yours,

Rebecca B DeCook

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Attachment

cc:

General Counsel

Office of Public Counsel



BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the 2001 Annual Report of)	
AT&T Communications of the Southwest, Inc)	Case No

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 requests confidential treatment of its 2001 annual report and requests an extension of time to file its 2001 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

 Competitive 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 income (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

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, 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 Case No. TE-2001-525
- 11. AT&T requests that the Commission grant AT&T an extension of time to file its annual report, pursuant to 4CSSR 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 4CSR 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 4CSR 240-10.080(8), and for such other relief as deemed necessary to protect the confidentiality of the annual report.

Respectfully submitted,

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

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the 2001 Annual Report of)		
AT&T Communications of the Southwest, Inc)	Case No.

AFFIDAVIT OF R. MATTHEW KOHLY

STATE OF MISSOURI)
) ss
COUNTY OF COLE	j

- 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, Suite 216, Jefferson City, MO 65101 City, Missouri 65101.
- 2. I am employed by AT&T in its Law and Government Affairs organization as a District Manager Government Affairs.
- 3. The annual report required to be filed by AT&T Communications of the Southwest, Inc. with the Public Service Commission under 4CSR 240-101.080(4) contains sensitive business information, specifically statements of the number of Missouri access lines that AT&T Communications of the Southwest, Inc. serves, and sensitive financial information, specifically statements of cash flows, balance sheets, and income statements that AT&T Communications of the Southwest, Inc. considers confidential.
- 4. Public disclosure of the business and financial information in the annual report would be competitively harmful to AT&T Communications of the Southwest, Inc.

5. AT&T Communications of the Southwest, Inc. 1s 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 Communications of the Southwest, Inc.'s competitors to determine the extent of AT&T Communications of the Southwest, Inc.'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 Communications of the Southwest, Inc.'s network facilities, operating expenses, revenues, customer base, and other competitively sensitive information to the detriment of AT&T Communications of the Southwest, Inc.

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 5th day of June, 2002.

Notary Public

Cole County, Missouri

My Commission expires:

MARCRISSIE T. HENLEY Cole County My Commission Expires August 3, 2002