

Regulatory and  
Governmental Affairs



April 15, 2002

601 Monroe Street, Suite 304  
Jefferson City, MO 65101  
Fax 573.636.6826

Mr. Dale Hardy Roberts  
Secretary/Chief Administrative Law Judge  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Jefferson City, MO 65101

Re: **In the Matter of the Filing of Verizon Advanced Data Inc.  
Interexchange Carrier  
2001 Annual Report  
Case No. \_\_\_\_\_**

Dear Mr. Roberts:

Enclosed for filing is the original and eight (8) copies of Verizon Advanced Data Inc.'s Interexchange Carrier *Motion for Confidential Treatment for Portions of the 2001 Annual Report*.

Also enclosed for filing is the original *2001 Annual Report for Verizon Advanced Data Inc.'s Interexchange Carrier* that includes the following;

- fully completed Highly Confidential version, and
- a redacted public version that clearly informs the reader that the redacted information has been submitted under seal.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas R. Parker" with a stylized flourish at the end.

Thomas R. Parker  
VP & Associate General Counsel

TRP:bjp  
Enclosures

c: Service List

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

In the Matter of the Filing of Verizon Advanced )  
Data Inc. Interexchange Carrier ) Case No. \_\_\_\_\_  
2001 Annual Report )

**MOTION FOR CONFIDENTIAL TREATMENT  
FOR PORTIONS OF THE 2001 ANNUAL REPORT**

COMES now Verizon Advanced Data Inc. ("VADI"), and respectfully states as follows:

1. VADI, hereby gives notice that pursuant to 4 CSR 240-10.080(1), it is filing its Annual Report for the year ended December 31, 2001.
2. Pursuant to 4 CSR 240-10.080(7), VADI requests the Commission issue an order protecting portions of its 2001 Annual Report, Specific and Total Revenues (page 4), as highly confidential records.

Good cause exists for classifying the subject records as highly confidential. The telecommunications industry is highly competitive, and it is imperative that public disclosure of VADI's financial statements be avoided due to the real danger of competitive harm which disclosure of this information would quite likely cause VADI.

VADI is a wholly owned subsidiary of GTE Corporation, and Verizon Communications Inc., and therefore, does not have separately audited financial statements. The relevant financial statements are only disclosed to banks, financial institutions and others that have a "need to know" requirement of the contents therein. When such occasions occur, the information is only disclosed on a confidential basis. This information is not available to the public in any format.

Making the subject information available to the public would reveal information to VADI's competitors which would unfairly permit business competitors access to its cash position, liabilities, marketing expenditures and other proprietary data which should not be disclosed without a protective order and an extraordinary showing of good cause. VADI should not be penalized or competitively disadvantaged for simply following the law.

In support of its Motion, VADI states as follows:

(a) The confidential information is not known outside of VADI's internal business operation and has not been disclosed to third parties without the benefit of a Protective Order or confidentiality agreement.

(b) The confidential information is not generally disseminated within VADI's business organization and is known only by those employees who have a legitimate business need to know and act upon the information.

(c) VADI has maintained and sought to preserve the confidentiality of the information through all appropriate means including the maintenance of appropriate security and the filing of this Motion.

(d) The disclosure of the confidential information would cause material damage to VADI's competitive and financial position, as well as cause the revelation of VADI's trade secrets, in that it would provide competitors with sensitive data respecting to VADI's business operations and/or revenues.

WHEREFORE, for all the reasons stated above, Verizon Advanced Data Inc. respectfully requests the Commission issue an order providing confidential treatment of portions of its 2001 Annual Report, Specific and Total Revenues (page 4), for the year ended December 31, 2001.

Respectfully submitted  
VERIZON ADVANCED DATA INC.

A handwritten signature in black ink, appearing to read "Tom R. Parker", is written over a horizontal line.

Thomas R. Parker, Bar #0028806  
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ITS ATTORNEY

## CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document was hand-delivered to Dale Hardy Roberts, Secretary/Chief Administrative Law Judge, Missouri Public Service Commission, 200 Madison Street, Suite 100, Jefferson City, Missouri and was hand-delivered this 15<sup>th</sup> day of April 2002 to the following:

Office of the Public Counsel  
200 Madison Street  
Jefferson City, MO 65101

Dana K. Joyce, General Counsel  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65101

  
Becky Powell