

Regulatory and
Governmental Affairs



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April 15, 2002

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

Re: IN THE MATTER OF THE FILING OF GTE MIDWEST INCORPORATED
D/B/A VERIZON MIDWEST
2001 ANNUAL REPORT
CASE NO. _____

Dear Mr. Roberts:

Enclosed for filing is the original and eight (8) copies of GTE Midwest Incorporated - Missouri Operations (ILEC) *Motion for Confidential Treatment for Portions of the 2001 Annual Report*.

Also enclosed for filing, in compliance with the provision of Section 392.210, RSMo 2000 and 4 CSR 240-10.080, are the original *2001 Annual Reports for GTE Midwest Incorporated-Missouri Operations (ILEC)* as follows:

- GTE Midwest Incorporated-Missouri Operations – Fully completed Highly Confidential version,
- GTE Midwest Incorporated-Missouri Operations – A redacted public version that clearly informs the reader that the redacted information has been submitted under seal,
- GTE Midwest Incorporated dba Verizon Midwest ARMIS Report, and
- Verizon 2001 Annual Report to Shareholders.

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 GTE Midwest)
Incorporated d/b/a Verizon Midwest)
2001 Annual Report) Case No. _____

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

COMES now GTE Midwest Incorporated d/b/a Verizon Midwest ("Verizon"), and respectfully states as follows:

1. Verizon, hereby gives notice that pursuant to 392.210 RSMo and 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), Verizon requests the Commission issue an order protecting portions of its 2001 Annual Report, specifically the Access Line Report (Schedule 10), 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 Verizon's location specific access lines be avoided due to the real danger of competitive harm which disclosure of this information would quite likely cause Verizon.

Verizon is a wholly owned subsidiary of GTE Corporation and Verizon Communications Inc., and therefore, does not have separately audited financial statements. The relevant data is 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 Verizon's competitors which would unfairly permit business competitors access to its marketing data and other proprietary data which should not be disclosed without a protective order and an extraordinary showing of good cause. Verizon should not be penalized or competitively disadvantaged for simply following the law.

In support of its Motion, Verizon states as follows:

(a) The confidential information is not known outside of Verizon'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 Verizon's business organization and is known only by those employees who have a legitimate business need to know and act upon the information.

(c) Verizon 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 Verizon's competitive and financial position, as well as cause the revelation of Verizon's trade secrets, in that it would provide competitors with sensitive data respecting to Verizon's business operations.

WHEREFORE, for all the reasons stated above, GTE Midwest Incorporated d/b/a Verizon Midwest respectfully requests the Commission issue an order providing confidential treatment of portions of its 2001 Annual Report, specifically the Access Line Report (Schedule 10), for the year ended December 31, 2001.

Respectfully submitted,
GTE MIDWEST INCORPORATED d/b/a
VERIZON MIDWEST

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

Thomas R. Parker, Bar #0028806
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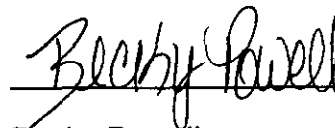
ITS ATTORNEY

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 15th 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