

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 Select Services Inc.
Competitive Local Exchange Carrier (CLEC)
2001 Annual Report
Case No. _____**

Dear Mr. Roberts:

Enclosed for filing is the original and eight (8) copies of Verizon Select Services Inc.'s Competitive Local Exchange Carrier (CLEC) *Motion for Confidential Treatment for Portions of the 2001 Annual Report*.

Also enclosed for filing is the original *2001 Annual Report for Verizon Select Services Inc.'s Competitive Local Exchange Carrier (CLEC)* which 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,


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 Select)
Services Inc.'s Competitive Local Exchange) Case No. _____
Carrier (CLEC) 2001 Annual Report)

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

COMES now Verizon Select Services Inc. ("VSSI"), and respectfully states as follows:

1. VSSI, 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), VSSI 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 VSSI's financial statements be avoided due to the real danger of competitive harm which disclosure of this information would quite likely cause VSSI.

VSSI 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 VSSI'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. VSSI should not be penalized or competitively disadvantaged for simply following the law.

In support of its Motion, VSSI states as follows:

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

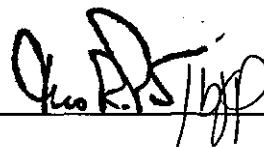
(b) The confidential information is not generally disseminated within VSSI's business organization and is known only by those employees who have a legitimate business need to know and act upon the information.

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

WHEREFORE, for all the reasons stated above, Verizon Select Services 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 SELECT SERVICES 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 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