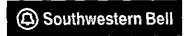


Southwestern Bell Telephone Legal Department Room 630 100 North Tucker Boulevard St. Louis, MO 63101-1976 Phone 314 247-2022 Fax 314 247-0881

NOV 1 0 1997

PUBLIC SERVICE COMMISSION



November 7, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
301 West High Street, Suite 530
Jefferson City, MO 65101

Re: Case No. TO-98-115

Dear Mr. Wright:

Enclosed for filing with the Commission in the above-referenced case are the original and fourteen copies of Southwestern Bell Telephone Company's Reasons for Classification in the Direct Testimony Filed on November 7, 1997.

Please stamp "Filed" on the extra copy and return to me in the enclosed self-addressed, stamped envelope.

Thank you for bringing this matter to the attention of the Commission.

Sincerely,

Diana J. Harter

Enclosures

CC: Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

FILED NOV 1 0 1997

In the Matter of AT&T Communications of the Southwest, Inc.'s Petition for Second Compulsory Arbitration Pursuant to Section 252(b) of the Telecommunications Act of 1996 to Establish an Interconnection Agreement with Southwestern Bell	•	Case No. TO-98-115	PUBLIC SERVICE COMMISSION
Interconnection Agreement with Southwestern Bell)		
Telephone Company.)		

SOUTHWESTERN BELL TELEPHONY COMPANY'S REASON FOR CLASSIFICATION IN THE DIRECT TESTIMONY FILED ON NOVEMBER 7, 1997

Southwestern Bell Telephone Company (SWBT) classified the Schedules and Exhibits of the Direct Testimony of Barry Moore and Barbara A. Smith as Highly Confidential. SWBT classified the following information as Highly Confidential because the exhibits and schedules contain highly sensitive market-specific information relating to services offered in competition with others. Specifically, they contain detailed cost information from the common cost allocation study and from SWBT's cost studies. This type of cost detail would be highly useful to competitors offering competing services in that it would help them determine whether to enter or exit the market and how to price their services. These cost study results are not otherwise available in the public domain, and, if so available, would be harmful to SWBT's ability to compete in the marketplace.

The following schedules are:

- 1. MISSOURI 1997-1999 UNBUNDLED PRIMARY RATE INTERFACE PORT FEATURES NONRECURRING COST
- 2. MISSOURI UNBUNDLED BASIC RATE INTERFACE PORT FEATURES NONRECURRING COST STUDY 1997-1999
- 3. MISSOURI UNBUNDLED BASIC RATE INTERFACE CIRCUIT SWITCHED

VOICE/CIRCUIT SWITCHED DATA NONRECURRING COST STUDY 1997-1999

- 4. MISSOURI EXTERNAL RATER/REFERENCE RESELLERS FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999
- 5. MISSOURI EXTERNAL RATER/REFERENCE FACILITY BASED PROVIDERS FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999
- 6. MISSOURI 1996-2000 DIRECTORY ASSISTANCE LISTING LONG RUN INCREMENTAL COST STUDY
- 7. MISSOURI DIRECT INWARD DIALING NONRECURRING COSTS 1997-1999
- 8. MISSOURI 1997-1999 LIDB SMS COST STUDY
- 9. MISSOURI 1997-1999 LSP EMERGENCY CONTACT FOR NON-PUBLISHED SERVICE FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY
- 10. MISSOURI 1997-1999 LSP EMERGENCY CONTACT FOR NON-PUBLISHED SERVICE FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY WORKPAPERS
- 11. MISSOURI CALLING NAME DELIVERY QUERY FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999
- 12. MISSOURI CALLING DELIVERY QUERY FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999 INVESTMENT STUDY/ADDITIONAL WORK PAPERS
- 13. MISSOURI LINE INFORMATION DATA BASE (LIDB) VALIDATION QUERY FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999
- 14. MISSOURI LINE INFORMATION DATA BASE (LIDB) VALIDATION QUERY FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999 INVESTMENT STUDY/ADDITIONAL WORK PAPERS
- 15. MISSOURI 1997-1999 OPERATIONAL SUPPORT SYSTEMS INFORMATION SYSTEMS, START UP AND ONGOING OPERATIONAL, REMOTE ACCESS FACILITY, HELPDESK FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY
- 16. MISSOURI 1997-1999 OPERATIONAL SUPPORT SYSTEMS INFORMATION SYSTEMS, STARTUP AND ONGOING OPERATIONAL, REMOTE ACCESS FACILITY, HELPDESK FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY WORKPAPERS

- 17. MISSOURI 1997-1999 UNBUNDLED CENTREX-LIKE ISDN COST STUDY
- 18. MISSOURI 1997-1999 UNBUNDLED CENTREX-LIKE ISDN WORKPAPERS
- 19. MISSOURI 1997-1999 UNBUNDLED CENTREX-LIKE ANALOG COST STUDY
- MISSOURI 1997-1999 UNBUNDLED CENTREX-LIKE ANALOG WORKPAPERS
- 21. MISSOURI UNBUNDLED CLEC TO SS7 STP COST STUDY 1997-1999 NOVEMBER, 1997
- 22. MISSOURI UNBUNDLED CLEC TO SS7 COST STUDY INVESTMENT BINDER 1997-1999 NOVEMBER, 1997
- 23. MISSOURI WHITE PAGES FOR OTHERS BY GEOGRAPHIC GROUPS FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY 1997-1999
- 24. MISSOURI UNBUNDLED DARK FIBER CROSSCONNECT COST STUDY 1997-1999 OCTOBER, 1997
- 25. MISSOURI UNBUNDLED NETWORK ELEMENTS (DARK FIBER) NONRECURRING COST STUDY 1997 SEPTEMBER, 1997
- 26. MISSOURI UNBUNDLED 4-WIRE DS-1 LOOP CROSS-CONNECT TO MULTIPLEXER 1997-1999 OCTOBER, 1997
- 27. MISSOURI UNBUNDLED CROSS-CONNECTS TO DCS AND SWITCH PORTS 1997-1999 OCTOBER, 1997
- 28. MISSOURI UNBUNDLED DEDICATED TRANSPORT ENTRANCE FACILITIES, DIGITAL CROSS-CONNECT SYSTEM (DCS), MULTIPLEXING AND DS-1 CROSS-CONNECT 1997-1999 OCTOBER, 1997
- 29. MISSOURI 1997-1999 UNBUNDLED SERVICE ORDER FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY
- 30. LSP COMPLEX SERVICE CONVERSION FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY MISSOURI 1997-1999
- 31. MISSOURI 1997-1999 MAINTENANCE OF SERVICE COST STUDY (LSPS)
- 32. MISSOURI 1997-1999 TIME AND MATERIAL COST STUDY (LSPS)

- 33. MISSOURI 1997-1999 UNBUNDLED LOCAL SWITCHING-FEATURES FORWARD LOOKING LONG RUN INCREMENTAL NONRECURRING COST STUDY
- 34. MISSOURI UNBUNDLED CALL TRACE PER ACTIVATION NONRECURRING COST STUDY 1997-1999
- 35. MISSOURI BRANDING FOR RESELLERS 1997-1999 OCTOBER 13, 1997
- 36. MISSOURI BRANDING FOR FACILITY-BASED PROVIDERS 1997-1999 OCTOBER 29, 1997
- 37. OPERATOR SERVICES COST MODEL MISSOURI 1996 JUNE, 1997
- 38. 1997-1999 MISSOURI E911 LSP SERVICE STUDY
- 39. 1997-1999 MISSOURI E911 AUTOMATIC LOCATION IDENTIFICATION FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY
- 40. MISSOURI 1997-1999 E911 AUTOMATIC LOCATION IDENTIFICATION FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY INVESTMENT BINDER
- 41. 1997-1999 MISSOURI E911 CONTROL OFFICE FORWARD LOOKING LONG RUN INCREMENTAL COST STUDY
- 42. MISSOURI 1997-1999 E911 CONTROL OFFICE FORWARD LOOKING LONG RUN INCREMENTAL INVESTMENT STUDY
- 43. MISSOURI NXX MIGRATION COST STUDY 1997-1998
- 44. MISSOURI 1995 FORWARD LOOKING COMMON COSTS STUDY AND WORKPAPERS

WHEREFORE, SWBT submits this pleading in compliance with Protective Order granted on November 6, 1997.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

#27011

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Attorneys for Southwestern Bell Telephone Company 100 N. Tucker, Room 630 St. Louis, Missouri 63101-1976 (314) 247-8280

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties on the attached Service List by first-class postage prepaid, U.S. Mail on November 7, 1997.

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