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February 2, 1987

Mr. Harvey G. Hubbs, Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: Case No. AO-87-48

Dear Mr. Hubbs:

Enclosed please find an original and 15 copies of the Response of Southwestern Bell Telephone Company to Office of Public Counsel's Motion to Unseal and Make Public Reports Filed by Certain Public Utilities in the case referenced above.

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

Thank you for your attention to this matter.

Very truly yours,

Jo-Nell Haraldson

Enclosure

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PUBLIC SERVICE COMMISSION

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BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the matter of the investigation)
of the revenue effects upon) Case No. AO-87-48
Missouri utilities of the Tax)
Reform Act of 1986.

RESPONSE OF SOUTHWESTERN BELL TELEPHONE COMPANY
TO OFFICE OF PUBLIC COUNSEL'S MOTION TO UNSEAL
AND MAKE PUBLIC REPORTS FILED BY CERTAIN PUBLIC UTILITIES

In response to the motion of the Office of Public Counsel to unseal and make public its December 15, 1986 filing in this docket, Southwestern Bell Telephone Company (hereinafter "Southwestern Bell") states:

1. On December 15, 1986 Southwestern Bell filed its response to the Commission's order establishing this docket. That filing contained detailed accounting information and working papers. In developing its response, Southwestern Bell believed it complied with the intent of the Commission's order establishing docket AO-87-48. By so responding, Southwestern Bell did provide accounting information in sufficient detail as to permit a complete review of its conclusions and supporting calculations. It is the detailed accounting working papers and information contained therein that required Southwestern Bell to file its response under a proprietary seal.

2. Several services which Southwestern Bell provides have or are in the process of becoming fully competitive. For example, its directory advertising revenues and expenses are associated with and a part of a fully competitive industry in Missouri. The accounting records filed by Southwestern Bell on December 15, 1986 gave exact monthly accounting information regarding the directory revenues and expenses and sets out other accounting information not made available to the general public. Since this proprietary and

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confidential information was included in the working papers, Southwestern Bell sought proprietary protection for its filing.

3. Southwestern Bell did not abuse its right to seek, and the Commission's authority to grant, proprietary status to information provided the Public Service Commission. After reviewing its December 15, 1986 filing, Southwestern Bell believes it can submit the data for the filing for February 28, 1987 in a format that does not require proprietary status and can be made public.

4. In addition, Southwestern Bell, as a part of the February 28, 1987 filing, will re-submit its December 15, 1986 filing in a form that it believes will meet the request of the Office of Public Counsel while at the same time protecting the detailed accounting information Southwestern Bell provided under seal in its December 15, 1986 filing.

5. In the event Southwestern Bell's proposal as described herein does not meet the Office of Public Counsel's request, Southwestern Bell denies the allegations and is prepared to go forward and identify the specific information in its working papers that it deems to be proprietary and present sufficient evidence to justify that status.

WHEREFORE, Southwestern Bell Telephone Company respectfully moves the Commission to dismiss the motion of the Office of Public Counsel in as far as it applies to Southwestern Bell, as it will file its February 28, 1987 response in a format to enable it to be made public, and will also submit with its February 28, 1987 filing the information filed December 15, 1986; or, in the alternative, grant Southwestern Bell a hearing at which it may present

evidence as to the proprietary aspects of the information it
filed with the Commission on December 15, 1986.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE CO.

By Jo Nell Haraldson
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Of Counsel:
DURWARD D. DUPRE

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the above was
mailed this 2nd day of February, 1987 to all parties of
record.

Jo Nell Haraldson