

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

In the Matter of an Investigation of the Actual Costs	)	
Incurred in Providing Exchange Access Service and	)	
The Access Rates to be Charged by Competitive Local	)	Case No. TR-2001-65
Exchange Telecommunications Companies in the	)	
State of Missouri.	)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S RESPONSE  
IN OPPOSITION TO AT&T'S MOTION REQUESTING THE ADOPTION OF A  
MODIFIED PROTECTIVE ORDER**

COMES NOW Southwestern Bell Telephone Company<sup>1</sup> and submits its Response in Opposition to AT&T's<sup>2</sup> Motion Requesting the Adoption of a Modified Protective Order (Motion). In support of its Response in Opposition, Southwestern Bell states to the Missouri Public Service Commission (Commission) as follows:

1. In its Motion, AT&T requests that the Commission scrap its Standard Protective Order,<sup>3</sup> which was developed by the Commission over a decade ago and which since then has proven -- time and time again -- to be effective in balancing the interests of parties participating in Missouri regulatory proceedings. AT&T requests that the Commission simply "replace" its Standard Protective Order with a different and less effective protective order based on a Texas document, which AT&T prefers. AT&T claims that the protection afforded Highly Confidential company-specific cost information by the Commission's Standard Protective Order, which was adopted by the Commission in this case on August 8, 2000, impedes its ability to "participate

---

<sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company, will be referred to in this pleading as "Southwestern Bell" or "SWBT."

<sup>2</sup> AT&T Communications of the Southwest, Inc., and its affiliates TCG St. Louis, Inc. and TCG Kansas City, Inc. will be referred to collectively as "AT&T."

<sup>3</sup> The Commission refers to the protective order it routinely issues in regulatory proceedings as its "standard" protective order. See, Order Establishing Case and Adopting Protective Order, Case No. TR-2001-65, p. 3. ("the Commission will adopt its standard protective order immediately.").

equally and fully in this proceeding.”<sup>4</sup> AT&T’s attack on the Commission’s Standard Protective Order is not limited to this case, however. Although AT&T’s arguments are aimed at the “cost” nature of this particular case, AT&T is also contemporaneously seeking to replace the Commission’s Standard Protective Order in other Missouri cases.<sup>5</sup>

2. AT&T’s assault on the Commission’s Standard Protective Order should be rejected by the Commission. The Commission’s Standard Protective Order, and in particular the provisions contained therein regarding “Highly Confidential” and “Proprietary” information, are particularly necessary in this case, which involves sensitive company-specific cost information. The Commission recognized this fact when it adopted, sua sponte, its Standard Protective Order in its August 8, 2000 Order Establishing Case and Adopting Protective Order in this case. In this Order the Commission stated:

This case will take the form of a Commission investigation in order to ensure that the necessary detailed cost information is included in the record. . . .Because this information is proprietary and highly confidential in a competitive environment, the Commission will adopt its standard protective order immediately. Parties are encouraged to suggest such *additional and further* measures to protect proprietary and highly confidential information as they may believe are necessary.<sup>6</sup>

3. The Commission’s Standard Protective Order has not unreasonably impeded AT&T’s or any other party’s ability to participate in this case. In fact, AT&T has had the exact same access to Southwestern Bell’s highly confidential cost information that Southwestern Bell has had to the costing information which has been designated highly confidential by other parties participating in this proceeding. Furthermore, Southwestern Bell’s (and most likely other carriers’) willingness to disclose such a large amount of competitively sensitive cost information

---

<sup>4</sup> AT&T Motion, par. 5.

<sup>5</sup> AT&T, along with IP Communications, has also asked the Commission to scrap its Standard Protective Order in Case No. TO-2002-397.

<sup>6</sup> Order Establishing Case and Adopting Protective Order, pp. 2-3 (emphasis added).

in this case was and is based upon the continued availability of the "Highly Confidential" designation for such information.

4. As the Commission is aware, parties from the various utility fields that practice before it have employed the Commission's Standard Protective Order in thousands of cases over the years to ensure that sensitive information can be disclosed in regulatory proceedings in ways that protect the legitimate business interests of a party and allow the Commission to make appropriate decisions. The availability of separate "Highly Confidential" and "Proprietary" designations contained in the Commission's Standard Protective Order was adopted by the Commission based on the input of diverse parties in Case Nos. TC-89-14, et al., and has been utilized successfully in numerous costing proceedings since then. In Case Nos. TC-89-14, et al., the Commission initially established a Protective Order with only one category of "confidential" information.<sup>7</sup> Just three months after adopting its initial Protective Order, however, the Commission found the single classification of "confidential" to be unworkable, and adopted a modified Protective Order containing two separate classifications of confidential information, "HIGHLY CONFIDENTIAL" and "PROPRIETARY."<sup>8</sup> The modified Protective Order adopted by the Commission in Case Nos. TC-89-14, et al. on November 8, 1988, and in particular the dual classification framework for sensitive information contained therein and in the Commission's Standard Protective Order issued in this and countless other cases, has unquestionably stood the test of time as a highly effective tool which carefully balances the needs of both the party seeking production of sensitive company-specific cost information and the party producing such information. The provisions of the Standard Protective Order ensure reasonable access to highly sensitive cost and marketing information to competitors who would

---

<sup>7</sup> Order Modifying Protective Order and Granting Late Filed Intervention, Case Nos. TC-89-14, TC-89-21, TO-89-29, and TO-89-10, p. 2 (issued November 8, 1988).

not otherwise have a right to review such material, but under conditions which protect the legitimate competitive interests of the producing party. Contrary to AT&T's claim, it is precisely this Standard Protective Order that has allowed the regulatory process to work in Missouri.

5. On a few occasions, a handful of parties have sought modifications to the Commission's Standard Protective Order. On each occasion, the Commission has rejected these attempts.<sup>9</sup> The Commission should similarly reject AT&T's attempt to replace the Commission's Standard Protective Order in this case with a Protective Order imported from another state. As the Commission recognized when it established this case, the Commission's Standard Protective Order is necessary to protect detailed cost information, which "is proprietary and highly confidential in a competitive environment."<sup>10</sup>

6. As the Commission is also aware, there have been rare occasions where it has been appropriate for Southwestern Bell to permit a small group of internal CLEC regulatory employees to review highly confidential cost study data during UNE cost proceedings. This very limited exception was permitted only with regard to employees who could certify that they were not involved in retail marketing, pricing, procurement or strategic analysis or planning. To make this accommodation, Southwestern Bell has entered into a separate, supplemental nondisclosure agreement with the CLEC to put appropriate safeguards in place to support this limited access to highly confidential cost study information.

---

<sup>8</sup> Id., p. 8.

<sup>9</sup> See, e.g., Case No. TO-97-40, Order Addressing Motion to Establish Procedural Schedule and Adopt Protective Order, issued August 9, 1996 at p. 4; Case No. TO-2000-322, Order Regarding Arbitration, issued November 29, 1999 at p. 3, and Case No. TO-2001-440, Order Regarding Motion for Reconsideration, issued October 9, 2001 at p. 4.

<sup>10</sup> Order Establishing Case and Adopting Protective Order, p. 3.

7. It is surprising that AT&T is now criticizing this supplemental nondisclosure agreement, as it was developed by AT&T and Southwestern Bell to resolve disputes over access to highly confidential cost information. This agreement was negotiated and first used without issue last year in the third AT&T arbitration, Case No. TO-2001-455. It was also used without incident in subsequent UNE pricing proceedings such as Case No. TO-2001-438 (which was the largest generic UNE pricing proceeding to date) and Case No. TO-2001-439. Southwestern Bell has already informed AT&T that it is willing to make the same arrangements with AT&T and any other party in this case as appropriate, and in fact has already entered into such an arrangement with one party to this case. There is simply no need to jettison the Commission's Standard Protective Order based on AT&T's inaccurate claim that it does not have sufficient access to Southwestern Bell's highly confidential company-specific cost information.

WHEREFORE, Southwestern Bell respectfully requests the Commission to deny AT&T's Motion Requesting the Adoption of a Modified Protective Order.

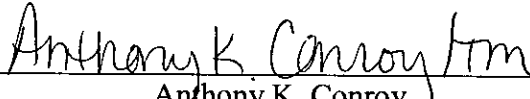
Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

By: Anthony K. Conroy *AKC*  
PAUL G. LANE #27011  
LEO J. BUB #34326  
ANTHONY K. CONROY #35199  
MIMI B. MACDONALD #37606  
Attorneys for Southwestern Bell Telephone, L.P.  
One SBC Center, Room 3516  
St. Louis, Missouri 63101  
314-235-6060 (Telephone)  
314-247-0014 (Facsimile)  
[anthony.conroy@sbc.com](mailto:anthony.conroy@sbc.com)

## CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail and first-class, postage prepaid, U.S. Mail or via hand-delivery on May 13, 2002.

  
Anthony K. Conroy

Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102

Secretary of the PSC  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Thomas R. Parker  
GTE Midwest Inc. d/b/a Verizon  
605 Monroe Street, Suite 304  
Jefferson City, MO 65101

Craig S. Johnson  
Andereck/Evans/Milne, et al.  
301 E. McCarty St., P.O. Box 1438  
Jefferson City, MO 65102

Mary Ann Carr Young  
P.O. Box 104595  
Jefferson City, MO 65110-4595

Brian T. McCartney/W.R. England III  
Brydon, Swearngen & England PC  
312 E. Capitol Ave., P.O. Box 456  
Jefferson City, MO 65102-0456

Sheldon K. Stock  
Greensfelder, Hemker & Gale, P.C.  
10 S. Broadway, Suite 2000  
St. Louis, MO 63102

Carl J. Lumley/Leland B. Curtis  
Curtis, Oetting, Heinz, et al.  
130 S. Bemiston, Suite 200  
St. Louis, MO 63105

Stephen F. Morris  
MCI Telecommunications Corp.  
701 Brazos, Suite 600  
Austin, TX 78701

Carol Keith  
Gabriel Communications of Missouri  
16090 Swingley Ridge Rd, Ste 500  
Chesterfield, MO 63017

Paul H. Gardner  
Goller, Gardner & Feather  
131 East High Street  
Jefferson City, MO 65101

Lisa C. Hendricks, Esq.  
6450 Sprint Parkway, Bldg 14  
Mail Stop KSOPHN0212-2A253  
Overland Park, KS 66251

James M. Fischer, Esq.  
Larry W. Dority, Esq.  
101 Madison St., Suite 400  
Jefferson City, MO 65101

Cass County Telephone Company  
P.O. Box 398  
260 West First Street  
Peculiar, MO 64078

Citizens Telephone Company of  
Higginsville Missouri  
1905 Walnut  
Higginsville, MO 64037

Craw-Kan Telephone Cooperative  
200 N. Ozark  
P.O. Box 100  
Girard, KS 66743

Ellington Telephone Company  
201 College Avenue  
P.O. Box 400  
Ellington, MO 63638

Farber Telephone Company  
Main & Linn Streets  
Farber, MO 63345

Fidelity Telephone Company  
64 N. Clark Avenue  
Sullivan, MO 63080

Goodman Telephone Company, Inc.  
185 Oneida Avenue  
P.O. Box 592  
Seneca, MO 64865

Granby Telephone Company  
P.O. Box 200  
Granby, MO 64844

Grand River Mutual Telephone Corp.  
1000 Kentucky Street  
Princeton, MO 64673

Green Hills Telephone Corporation  
7926 N.E. SR M  
P.O. Box 227  
Breckenridge, MO 64625

Holway Telephone Company  
208 Ash Street  
P.O. Box 112  
Maitland, MO 64466

Iamo Telephone Company, Inc.  
104 Crook Street  
P.O. Box 368  
Coin, IA 51636

Kingdom Telephone Company  
211 S. Main  
P.O. Box 97  
Auxvasse, MO 64779

KLM Telephone Company  
P.O. Box 30  
Rich Hill, MO 64779

Lathrop and Gage  
P.O. Box 167  
Princeton, MO 64673

Le-Ru Telephone Company, Inc.  
P.O. Box 147  
Stella, MO 64867

Mark Twain Rural Telephone Company  
Highway 6 East  
P.O. Box 68  
Hurdland, MO 63547

Miller Telephone Company  
209 E. Main Street  
P.O. Box 7  
Miller, MO 65707

New Florence Telephone Company  
101 N. Main Street  
P.O. Box 175  
New Florence, MO 63363

New London Telephone Company  
501 S. Main Street  
P.O. Box 369  
New London, MO 63459

Orchard Farm Telephone Company  
5065 N. Highway 94  
St. Charles, MO 63301

Oregon Farmers Mutual Telephone Co.  
118 E. Nodaway  
P.O. Box 227  
Oregon, MO 64473

Ozark Telephone Company  
810 Oneida Avenue  
P.O. Box 547  
Seneca, MO 64865

Peace Valley Telephone Company, Inc.  
7101 State Highway W  
P.O. Box 9  
Peace Valley, MO 64482

Rock Port Telephone Company  
107 Opp Street  
P.O. Box 147  
Rock Port, MO 64482

Seneca Telephone Company  
P.O. Box 329  
Seneca, MO 64865

Spectra Communications Group, LLC  
9200 Ward Parkway, Suite 600  
Kansas City, MO 64114

Steelville Telephone Company  
Highway T  
P.O. Box 97  
Stoutland, MO 65567

AccuTel of Texas, Inc.  
7900 John W. Carpenter Freeway  
Dallas, TX 75247

ACSI Local Switched Services, Inc.  
131 National Business Pkwy, Suite 100  
Annapolis, MD 20701

Adelphia Business Solutions Oper.  
Main & Water Street  
Coudersport, PA 16915

Allegiance Telecom of Missouri, Inc.  
1950 Stemmons Freeway, Suite 3026  
Dallas, TX 75207

Alltel Communications, Inc.  
One Allied Drive  
P.O. Box 2177  
Little Rock, AR 72203

American Communication Services of  
Kansas City, Inc.  
131 National Business Pkwy, Suite 100  
Annapolis Junction, MD 20701

AT&T Communications of the  
Southwest  
101 W. McCarty, Suite 216  
Jefferson City, MO 65101

BarTel Communications, Inc.  
333 Leffingwell, Suite 101  
St. Louis, MO 63122

Birch Telecom of Missouri, Inc.  
2020 Baltimore Avenue  
Kansas City, MO 64108

BroadStream Corporation  
4513 Pin Oak Court  
Sioux Falls, SD 57103

Business Telecom, Inc., d/b/a BTI  
4300 Six Forks Rd., Suite 400  
Raleigh, NC 27609

Buy-Tel Communications, Inc.  
6409 Colleyville Blvd.  
P.O. Box 1170  
Colleyville, TX 76034

Camarato Distributing, Inc.  
900 Camarato Drive  
Herrin, IL 63948

Central Mo. Telecommunications, Inc.  
P.O. Box 596  
Osage Beach, MO 65065

Choctaw Communications, L.C., d/b/a  
Smoke Signal Communications  
1600 Viceroy  
Dallas, TX 75235

Ciera Network Systems, Inc.  
2630 Fountainview Drive, Suite 300  
Houston, TX 77057

Comm S. Companies, Inc., d/b/a  
Missouri Comm South, Inc.  
6830 Walling Lane, P.O. Box 821269  
Dallas, TX 75382

Computer Business Sciences, Inc.  
80-02 Kew Gardens Rd., Suite 5000  
Kew Gardens, NY 11415

Delta Phones, Inc.  
105 Illinois Street  
P.O. Box 784  
Delhi, LA 71232

DMJ Communications, Inc.  
2525 N. Grandview, Suite 900  
Odessa, TX 79761

ExOp of Missouri, Inc.  
303 N. Jefferson  
Kearney, MO 64060

EZ Talk Communications, L.L.C.  
4727 S. Main  
Stafford, TX 74777

Fast Connections, Inc.  
P.O. Box 130418  
Dallas, TX 75313

Frontier Local Services, Inc.  
1221 Nicollet Mall, Suite 300  
Minneapolis, MN 55403

Frontier Telemanagement  
180 S. Clinton  
Rochester, NY 14646

Global Crossing Local Services, Inc.  
1221 Nicollet Mall, Suite 300  
Minneapolis, MN 55403

Green Hills Telecommunications Serv.  
7926 N.E. SR M  
Breckenridge, MO 64625

Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619

Ionex Communications, Inc.  
5710 LBJ Freeway, Suite 215  
Dallas, TX 75240

KMC Telecom III, Inc.  
1543 Route 206, Suite 300  
Bedminster, NJ 07921

LDD, Inc.  
24 S. Minnesota  
Cape Girardeau, MO 63702

Level 3 Communications, LLC  
1025 Eldorado Blvd.  
Broomfield, CO 80021

Logix Communications Corp.  
3555 NW 58<sup>th</sup>, Suite 900  
Oklahoma City, OK 73112

Mark Twain Communications Co.  
P.O. Box 128  
Hurdland, MO 63547



Maxcom, Inc.  
10647 Widmer Rd.  
Lenexa, KS 66215

Max-Tel Communications, Inc.  
102 W. Franklin  
P.O. Box 280  
Alvord, TX 76225

Missouri Telecom, Inc.  
515 Cleveland, Suite C  
P.O. Box 419  
Monett, MO 65708

Navigator Communications, LLC  
P.O. Box 13860  
Little Rock, AR 72113

Net-Tel Corp., d/b/a Net-Tel  
Communications Corp.  
11921 Freedom Drive, Suite 550  
Reston, VA 20190

NOW Communications, Inc.  
713 Country Place Drive  
Jackson, MS 39208

Omniplex Communications Group  
17 Missouri Research Park Dr.  
St. Charles, MO 63304

The Page Company  
3030 East Truman Road  
Kansas City, MO 64127

Preferred Carrier Service, Inc., d/b/a  
Phones for All  
14681 Midway Rd., Suite 105  
Dallas, TX 75244

QCC, Inc.  
8829 Bond Street  
Overland Park, KS 66124

Quick-Tel Communications, Inc.  
456 W. Rock Island  
P.O. Box 196  
Boyd, TX 76023

Quintelco, Inc.  
1 Blue Hill Plaza  
Pearl River, NY 10965

Reitz Rentals, Inc., d/b/a South West  
TeleConnect  
7000 Cameron Rd., Suite 200  
Austin, TX 78752

Ren-Tel Communications, Inc.  
1734 Highway 113 North  
Carrollton, GA 30117

Simply Local Services, Inc.  
2225 Apollo Drive  
Fenton, MO 63026

Snappy Phone of Texas, Inc., d/b/a  
Snappy Phone  
6901 W. 70<sup>th</sup> St, P.O. Box 29620  
Shreveport, LA 71129

Rebecca B. DeCook  
AT&T Communications of Southwest  
1875 Lawrence Street, Suite 1575  
Denver, CO 80202

Sprint Communications Company, LP  
8140 Ward Parkway - 5E  
Kansas City, MO 64114

Sterling International Funding, d/b/a  
Reconex  
P.O. Box 40  
Hubbard, OR 97032-0040

Suretel, Inc.  
5 N. McCormick  
Oklahoma City, OK 73127

TCG Kansas City, Inc.  
Teleport Communications Group  
2 Teleport Drive, Suite 300  
Staten Island, NY 10311

TCG St. Louis  
Teleport Communications Group  
2 Teleport Drive, Suite 300  
Staten Island, NY 10311

Teligent, Inc.  
8065 Leesburg Pike, Suite 400  
Vienna, VA 22182

Tel-Link, LLC  
1001 Third Avenue West, Suite 354  
Bradenton, FL 34205

Tin Can Communications Co., LLC  
1063 Wirt Rd., Suite 202  
Houston, TX 77005

TranStar Communications, LLC  
P.O. Box 2999  
Harlingen, TX 78551

United States Telecommunications,  
Inc., d/b/a Tel Com Plus  
13902 N. Dale Mabry, Suite 212  
Tampa, FL 33618

Universal Telephone  
2405 E. Pawnee, Suite 10  
Wichita, KS 67211

USLD Communications, Inc.  
4250 N. Fairfax Drive, Ste 12W002  
Arlington, VA 22203

U.S. Telco, Inc., d/b/a 1-800-Reconex  
2500 Industrial Avenue  
P.O. Box 40  
Hubbard, OR 97032

Worknet Communications, Inc.  
7777 Bonhomme Avenue, Suite 2000  
St. Louis, MO 63105

2<sup>nd</sup> Century Communications, Inc.  
7702 Woodland Center  
Tampa, FL 33614

Advanced Telcom Group, Inc.  
110 Stony Point Road, 2<sup>nd</sup> Floor  
Santa Rosa, CA 95401

American Fiber Network, Inc.  
9401 Indian Creek Parkway, Suite 140  
Overland Park, KS 66210

Atlas Communications, Ltd.  
482 Norristown Road, Suite 200  
Blue Bell, PA 19422

Basicphone, Inc.  
3512 Mockingbird, Suite D  
Orange, TX 77630

BellSouthBSE, Inc.  
32 Perimeter Center East  
Atlanta, GA 30346

Bluestar Networks, Inc.  
801 Crescent Center Drive, #600  
Franklin, TN 37064

Broadband Office Communications Inc.  
2900 Telestar Court, 2<sup>nd</sup> Floor  
Falls Church, VA 22042

CapRock Telecommunications Corp.  
15601 N. Dallas Parkway, Suite 700  
Addison, TX 75001

CAT Communications Intern'l, Inc.  
4142 Melrose Ave. N.W., Suite 25  
Roanoke, VA 24107

C.C.O. Telecom, Inc.  
7265 N. Oak Trafficway  
Gladstone, MO 64118

CCCMO, Inc., d/b/a Connect!  
124 W. Capitol, Suite 250  
Little Rock, AR 72203

Compass Telecommunications, Inc.  
7001 Scottsdale Rd., Suite 2000  
Scottsdale, AZ 85250

Connectsouth Communications of  
Missouri, Inc.  
9600 Great Hills Trail  
Austin, TX 78759

Convergent Communications Services  
400 Inverness Drive South, Suite 400  
Englewood, CO 80112

Cox Missouri Telecom LLC  
231 E. 4<sup>th</sup> Street  
P.O. Box 696  
Carthage, MO 64836

Cypress Communications Operating Co  
15 Piedmont Center, Suite 100  
Atlanta, GA 30305

Dial & Save of Missouri, Inc.  
8750 N. Central Expressway, Ste 1500  
Dallas, TX 75231

Digital Broadcast Network Corporation  
424 S. Woods Mill Rd., Suite 350  
Chesterfield, MO 63017

Digital Teleport, Inc.  
8112 Maryland Avenue, 4<sup>th</sup> Floor  
St. Louis, MO 63105

dPi-Telconnect LLC  
2997 LBJ Freeway, Suite 225  
Dallas, TX 75234

Eagle Communications Missouri, Inc.  
60 E. 56<sup>th</sup> Street  
New York, NY 10022

Essential.com, Inc.  
3 Burlington Woods Drive, 4<sup>th</sup> Floor  
Burlington, MA 01803

Everest Connections Corporation  
5555 Winghaven Blvd.  
O'Fallon, MO 63366

Excel Telecommunication Systems, Inc  
8750 N. Central Expressway, Ste 2000  
Dallas, TX 75231

Fairpoint Communications Solutions  
6324 Fairview Rd., Suite 400  
Charlotte, NC 28210

Focal Communications Corp of  
Missouri  
200 N. LaSalle Street, Suite 800  
Chicago, IL 60601

GE Capital Communications Services  
d/b/a GE Exchange  
6540 Powers Ferry Road  
Atlanta, GA 30339

Group Long Distance, Inc.  
400 E. Atlantic Blvd.  
Pompano Beach, FL 33060-6200

GTE Communications Corp.  
6665 N. MacArthur  
Irving, TX 75038

HJN Telecom, Inc.  
3235 Satellite Blvd, Bldg 400, Ste 300  
Duluth, GA 30096

JATO Operating Corporation  
1099 18<sup>th</sup> Street, Suite 2200  
Denver, CO 80202

Kansas City Fiber Network, LP  
111 Main Street, Suite 300  
Kansas City, MO 64105

LDM Systems, Inc.  
430 Park Avenue, 5<sup>th</sup> Floor  
New York, NY 10022

Local Line America, Inc.  
P.O. Box 4551  
Akron, OH 44310

Maxcess, Inc.  
100 W. Lucerne Plaza, Suite 200  
Orlando, FL 32801

Megsinet-CLEC, Inc.  
225 W. Ohio, Suite 200  
Chicago, IL 60610

Metro Connection,  
d/b/a Transamerican Telephone  
209 E. University  
Denton, TX 76201

MVX.com Communications, Inc.  
100 Rowland Way, Suite 145  
Novato, CA 94945

Onfiber Carrier Services, Inc.  
11921 N. MO PAC Expwy, Suite 100  
Austin, TX 78759

Onsite Access Local, LLC  
1372 Broadway, 2<sup>nd</sup> Floor  
New York, NY 10018

Pathnet, Inc.  
11720 Sunrise Valley Drive  
Reston, VA 20191

Payroll Advance, Inc.  
808 S. Baker  
Mountain Home, AR 72643

Prism Missouri Operations, Inc.  
1667 K. Street, N.W., Suite 200  
Washington, DC 20006

Rocky Mountain Broadband, Inc.  
999 18<sup>th</sup> Street, Suite 2201  
Denver, CO 80202

Supra Telecommunications &  
Information Systems, Inc.  
2620 S.W. 27<sup>th</sup> Avenue  
Miami, FL 33133

Tel-Save, Inc. of Pennsylvania  
6805 Route 202  
New Hope, PA 18938

TLC Next Generation International  
Holdings, LLC  
911 Washington, Suite 625  
St. Louis, MO 63101

TransNational Telecommunications Inc  
8626 Tesora Drive, Suite 440  
San Antonio, TX 78217

Universal Access, Inc.  
100 N. Riverside Plaza, Suite 2200  
Chicago, IL 60606

U.S. Telepacific Corp., d/b/a  
TelePacific Communications  
515 S. Flower Street, 49<sup>th</sup> Floor  
Los Angeles, CA 90071

Vectris Telecom, Inc.  
5000 Plaza on the Lake, Suite 205  
Austin, TX 78746

Z-Tel Communications, Inc.  
601 S. Harbour Island Blvd, Suite 220  
Tampa, FL 33602

J. Steve Weber  
AT&T Communications of Southwest  
101 W. McCarty, Suite 216  
Jefferson City, MO 65101