

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

In the Matter of the Application of MCC Telephony)
of Missouri, Inc., for Waiver of Compliance with) Case No. TE-2006-0415
the Requirements of 4 CSR 240-32.)

**STAFF’S MOTION TO CLASSIFY
IN-CAMERA TRANSCRIPT AS PUBLIC INFORMATION**

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. MCC Telephony of Missouri, Inc., filed an application with the Commission requesting a waiver of compliance with the requirements of 4 CSR 240-32.080 (5) (A) 1. This rule establishes a service objective that ninety percent or more of orders for basic local telecommunications service shall be installed within five working days.

2. MCC claims an inability to meet this standard, in part, because it has contracted with Sprint to perform part of the installation and the contract does not require Sprint to meet the installation standard.

3. A redacted version of MCC’s contract with Sprint is labeled CC Schedule 1 and is attached to the Direct Testimony of MCC’s witness Craib. Because the entire contract is stamped confidential, examination of MCC witnesses Craib and Liston concerning the contract was conducted in-camera. (Transcript, Volume 3)

4. The Protective Order issued in this case provides the following definitions for information which a party claims should not be made public.

HIGHLY CONFIDENTIAL: Information concerning (1) material or documents that contain information relating directly to specific customers; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to services offered in competition with others; (4) reports, work papers or other documentation related to work produced by internal or external auditors or consultants; (5) strategies employed, to be employed, or under consideration in contract negotiations.

PROPRIETARY: Information concerning trade secrets, as well as confidential or private technical, financial and business information.

5. The in-camera testimony includes neither highly confidential nor proprietary information. It includes no material relating to specific customers, no employee information, no marketing analysis or other market specific information, no documentation from auditors or consultants, no contract strategies, no trade secrets, and no confidential or private technical, financial or business information. It includes discussion of only routine matters as one would reasonably expect in such a contract: who signed the contract, designation of the parties, assignment of responsibilities, meeting plans, description of fees, etc.

WHEREFORE, the Staff requests the Commission to classify Volume 3, the in-camera transcript, as public information.

Respectfully submitted,

/s/ William K. Haas

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 21st day of March 2007.

/s/ William K. Haas