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May 22, 2002

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P. O. Box 360
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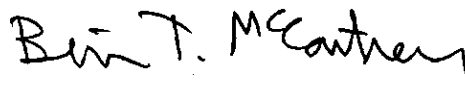
Re: Case No. **TR-2001-65**

Dear Mr. Roberts:

Enclosed for filing in above-referenced matter, please find an original and eight copies of the STCG's Response to Staff and SWBT's Pleadings Regarding a Modified Protective Order.

Please see that this filing is brought to the attention of the appropriate Commission personnel. If you have any questions regarding this matter, please direct them to me at the above number. Otherwise, I thank you in advance for your cooperation in this matter.

Sincerely,



Brian T. McCartney

BTM/da
Enclosures
cc: Parties of Record

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 Exchange Telecommunications
Companies in the State of Missouri.

Case No. TR-2001-65

THE STCG'S RESPONSE
TO STAFF AND SWBT'S PLEADINGS
REGARDING A MODIFIED PROTECTIVE ORDER

COMES NOW the STCG, and for its Response to Staff and SWBT's Pleadings
Regarding a Modified Protective Order, states to the Commission as follows:

SUMMARY

The STCG believes that the Commission should retain its standard protective order and the "Highly Confidential" and "Proprietary" designations. The standard protective order has been used for many years, and it has served the Commission and the parties well. Moreover, it has been well over one year since the Commission adopted the protective order in this case, and highly sensitive material has already been exchanged between the parties to this case. Therefore, it is rather late in the process to scrap one protective order and adopt another one. However, the STCG would not object if the Commission allows one (1) internal cost expert from AT&T to review the cost studies in this case so long as AT&T's expert signs the non-disclosure agreement and complies with the Commission's standard protective order.

THE COMMISSION SHOULD RETAIN ITS STANDARD PROTECTIVE ORDER.

1. The Commission established this case and adopted its standard protective order on August 8, 2000, well over a year ago. AT&T should have raised its concerns regarding the Commission's protective order at that time. Sensitive cost information has already been filed in this case, so AT&T's objections to the Commission's standard protective order are not timely. Thus, the Commission should not rescind the Commission's standard protective order and replace it with AT&T's proposed protective order.

2. The Commission's standard protective order has been used by the Commission and the parties that practice before it for many years. AT&T's concerns about the Commission's standard protective order are not new. In fact, AT&T and other parties have raised similar concerns in other cases which have been rejected by the Commission.¹ The STCG concurs with SWBT's response in opposition to AT&T's motion for a completely different Texas protective order.

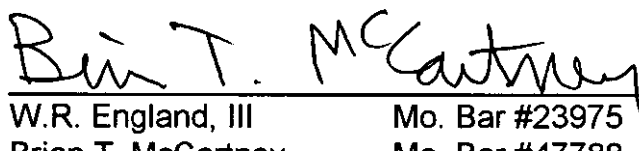
THE COMMISSION MAY MODIFY ITS STANDARD PROTECTIVE ORDER

3. In order to address AT&T's concerns without undoing its present order, the Commission could modify the standard protective order issued in this case to allow one (1) in-house cost expert from AT&T to review the "Highly Confidential" cost information that has been and will be filed in this case so long as AT&T's expert signs

¹ For example, see Case No. TO-97-40, *Order Addressing Motion to Establish Procedural Schedule and Adopt Protective Order*, issued Aug. 9, 1996, p. 4.

the standard non-disclosure agreement and abides by its terms.² The safeguards outlined in SWBT's separate, supplemental nondisclosure agreement could also be put in place. For example, the AT&T cost expert would certify that they were not involved in retail marketing, pricing, procurement or strategic analysis and planning. The STCG would not object to such a modification of the Commission's standard protective order in this case.

Respectfully submitted,



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Attorneys for the Small Telephone Company Group

² This would appear to be consistent with the separate, supplemental non-disclosure agreement that has been used by SWBT and other parties in the past.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 22nd day of May, 2002 to:

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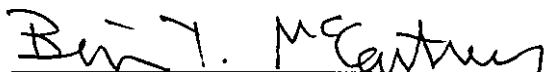
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