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FILED²

NOV 05 2002

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Secretary of the Public Service Commission
Missouri Public Service Commission
P. O. Box 360
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Missouri Public
Service Commission

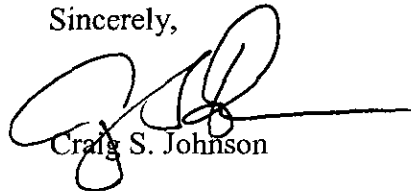
**Re: Mid-Missouri Tel Co v. Southwestern Bell Telephone Company
Case No. TC-2002-190**

Dear Secretary:

Enclosed please find an original and three (3) copies of Mid-Missouri Telephone Company's Motion for In House Access to HC Information.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:tr

Enc.

Cc: Keith Krueger
Michael Dandino
Leo Bub
Denise Day/Gary Romig
David Jones
Joey Knipp

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BEFORE THE
PUBLIC SERVICE COMMISSION OF MISSOURI

FILED²
NOV 05 2002

Missouri Public
Service Commission

MID-MISSOURI TELEPHONE COMPANY,)

Petitioner,)

vs.)

SOUTHWESTERN BELL TELEPHONE
COMPANY,)

Respondent.)

Case No. TC-2002-190

MOTION FOR IN HOUSE ACCESS TO HC INFORMATION

COMES NOW Petitioner, Mid-Missouri Telephone Company, and hereby moves that the Commission issue an Order permitting Mid-Missouri Telephone Company to designate three employees and one former employee as in-house internal subject matter experts, both regulatory and technical, in order for them to have access to data supplied by Southwestern Bell under a "highly confidential" designation, on the same basis as outside consultants. Mid-Missouri Telephone Company hereby designates the following three employees: Denise Day, Gary Romig, and Joey Knipp, and former employee David Jones. These employees and former employees have participated thus far in this proceeding, and were active in the exchange of data between Mid-Missouri Telephone Company, Staff, and Southwestern Bell leading to the provision of data to which this motion is directed.

In support of this request, Mid-Missouri Telephone Company states as follows:

1. On or about July 9, 2002, at Southwestern Bell's request, the Commission issued an Order granting permission to Southwestern Bell to designate internal subject matter experts, both regulatory and technical, to have access to highly confidential Mid-Missouri Telephone Company switch data, on the same basis as outside consultants. Pursuant to that Order regarding

protective order, Southwestern Bell Telephone Company in-house personnel have had access to this highly confidential data in order to review it for purposes of this proceeding.

2. In the course of the ongoing investigations into this case, Southwestern Bell has recently supplied switch or business intelligence recording data it designated as "highly confidential". This was part of information SWBT provided as an analysis of a 24 hour traffic period for which Mid-Missouri supplied its switch data to SWBT for its review. Unless Mid-Missouri in-house personnel are granted the same access to SWB's HC data as was granted for SWBT for access to Mid-Mo HC data, Mid-Missouri will not be able to further the informal investigation without having to employ outside consultants.

3. Mid-Missouri Telephone Company respectfully submits that, pursuant to the due process clauses of the Federal and State Constitution, it too has a property interest in this proceeding, and it is in need of the relief requested herein in order to litigate this case on an equal basis to Southwestern Bell Telephone Company.

4. Mid-Missouri Telephone Company further submits that, although the data in question has been designated as highly confidential by Southwestern Bell Telephone Company, there is a not a prospect of irreparable harm to competitors for whom the data in question might be competitively sensitive, in that Mid-Missouri Telephone Company is not a competitive toll services provider, and would have little or no capability to utilize the data to its competitive advantage in any particular geographic or market-specific area.

5. Mid-Missouri Telephone Company further states that, if this request is granted, the above-designated internal subject matter experts will execute and file a non-disclosure agreement as is required of outside consultants, and if granted access will not further disclose the

traffic data in question other than for purposes of this case. Copies of such non-disclosure agreements for Denise Day, Gary Romig, and Joe Knipp are attached hereto.

WHEREFORE, on the basis of the foregoing, Mid-Missouri Telephone Company respectfully requests that this Motion be granted.

**ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.**

By 

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ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, U.S. Mail, postage pre-paid, this 1 day of ~~January~~ ^{November}, 2002, to: all attorneys of record in this proceeding.



Craig S. Johnson

APPENDIX "A"

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

NONDISCLOSURE AGREEMENT

I, Gary Romig, have
been presented a copy of this Protective Order issued in Case No. TL-2002-190 on the
7th day of February, 2002

I have requested review of the confidential information produced in Case
No. TL-2002-190 on behalf of Mid Missan. Telephone Co.

I hereby certify that I have read the above-mentioned Protective Order and agree
to abide by its terms and conditions.

Dated this 30th day of October, 2002

Gary Romig Co-CEO
Signature and Title

Employer

Petitioner
Party

Address

660 034 3311
Telephone

APPENDIX "A"

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

NONDISCLOSURE AGREEMENT

I, Denise Day, have
been presented a copy of this Protective Order issued in Case No. TC-2002-190 on the
7th day of February, 2002.

I have requested review of the confidential information produced in Case
No. TC-2002-190 on behalf of Mid Mo Telephone Company

I hereby certify that I have read the above-mentioned Protective Order and agree
to abide by its terms and conditions.

Dated this 30th day of October, 2002.

Denise M. Day, Co-President
Signature and Title

Mid-Missouri Telephone Co.
Employer

Petitioner
Party

Address

660 834 3311
Telephone

APPENDIX "A"

STATE OF MISSOURI
PUBLIC SERVICE COMMISSION

NONDISCLOSURE AGREEMENT

I, Joe Knipp, have
been presented a copy of this Protective Order issued in Case No. TC-2002-190 on the
7th day of February, 2002.

I have requested review of the confidential information produced in Case
No. TC-2002-190 on behalf of Mid-Missouri Telephone Company

I hereby certify that I have read the above-mentioned Protective Order and agree
to abide by its terms and conditions.

Dated this 30th day of October, 2002.

Joe Knipp
Signature and Title

Mid-Missouri Telephone Co.
Employer

Petitioner
Party

Address

660 834 3311
Telephone