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November 19, 2003

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**Missouri Public
Service Commission**

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Case No. TO-2004-0207

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter the original and five copies of AT&T's Response to Sprint's Motion to Challenge Highly Confidential Designations.

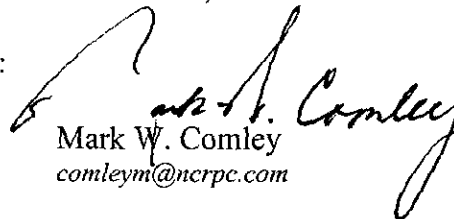
Service of the enclosed pleading is being effected by electronic mail to those parties whose representatives shared email addresses at the pre-hearing conference on November 18, 2003. All other parties on the service list will receive by regular mail a copy of this letter without the pleading. However, recipients of just the letter are welcome to request a copy of the pleading from this office and it will be sent immediately.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
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MWC:ab

Enclosure

cc: Office of Public Counsel
General Counsel's Office
Rebecca DeCook
Bill Magness
Counsel and parties of record as described herein

FILED

NOV 19 2003

Missouri Public
Service Commission

IN THE MATTER OF A)
COMMISSION INQUIRY)
INTO THE POSSIBILITY OF)
IMPAIRMENT WITHOUT)
UNBUNDLED LOCAL CIRCUIT)
SWITCHING WHEN SERVING)
THE MASS MARKET)

Case No. TO-2004-0207

**AT&T's RESPONSE TO SPRINT'S MOTION TO CHALLENGE
HIGHLY CONFIDENTIAL DESIGNATIONS**

AT&T Communications of the Southwest, Inc., AT&T Local Services on behalf of TCG St. Louis, Inc. and TCG Kansas City, Inc. (collectively "AT&T") submit this response to Sprint's Motion to Challenge Highly Confidential Designations, filed November 17, 2003.

1. In their filings in response to the Commission's November 5, 2003 Order in this proceeding, SBC Missouri and CenturyTel designated certain information as Highly Confidential as that term is used in the Standard Protective Order. See SBC Missouri's Response To Order Directing Filing at Exhibit A-HC and Exhibit B-HC (Nov. 10, 2003); CenturyTel's Response To Order Directing Filing at Exhibit A-HC and Exhibit B-HC. Sprint's Motion challenges these designations.

2. The information designated as Highly Confidential in the ILEC filings is information that pertains to CLECs. It is those CLECs whose legal interests in confidentiality are affected here. At yesterday's prehearing conference, SBC Missouri and CenturyTel both indicated that they had designated material as Highly Confidential in order to protect potential CLEC interests in the

information, and that both ILECs would accept any reclassification of the information that was satisfactory to the affected CLEC.

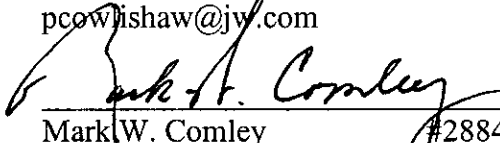
3. Insofar as the Highly Confidential exhibits filed by SBC Missouri and CenturyTel contain statements regarding AT&T, AT&T does not object to the reclassification of those materials as Proprietary, subject to the protections of the Standard Protective Order applicable to Proprietary information. AT&T has contacted counsel for Sprint this morning, and can confirm that reclassification of the information pertaining to AT&T (including both switching and dedicated transport information currently designated as HC in the ILEC filings) will be satisfactory to Sprint and will resolve Sprint's motion, insofar as it concerns information pertaining to AT&T.

4. Protection of sensitive CLEC information will be important in this proceeding. By agreeing to reclassify the AT&T-related information as Proprietary, AT&T does not mean to understate the importance of protecting its confidentiality. The CenturyTel filing, in particular, purports to identify individual competitors with specific transport routes, commercially sensitive information that should in no respect be treated as non-proprietary. (Indeed, the Sprint motion did not.) That said, AT&T agrees that the protections offered by the Standard Protective Order for Proprietary information should be adequate for protection of the particular categories of information placed at issue by Sprint's motion.

WHEREFORE, premises considered, AT&T requests the Commission to direct that the information that was designated as Highly Confidential in the subject SBC Missouri and CenturyTel filings be reclassified as "Proprietary" for purposes of application of the Standard Protective Order, insofar as that information pertains to AT&T.

Respectfully submitted,

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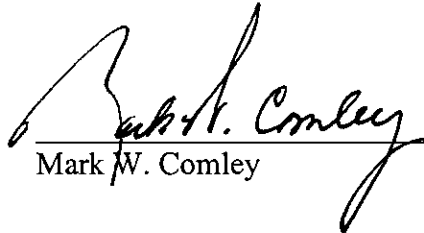


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ATTORNEYS FOR AT&T

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 19th day of November, 2003, to General Counsel's Office at gencounsel@psc.state.mo.us; Office of Public Counsel at opcservice@ded.state.mo.us; Paul G. Lane, SBC Missouri, at paul.lane@sbc.com, lwdority@sprintmail.com; jfischerpc@aol.com; clumley@cohgs.com; stephen.morris@mci.com; bcobb@covad.com; ckeith@nuvox.com; bmagness@phonelaw.com; vkirk@phonelaw.com; rmulvany@birch.com; lisa.c.creightonhendricks@email.sprint.com; nathan.williams@psc.mo.gov; stewart499@aol.com; kmudge@reglaw.com; mike.dandino@ded.mo.gov; myoung0654@aol.com; wds@wdspc.com; David.Woodsmall@xspedius.com; wcourter@mcleodusa.com; charles.gerkin@algx.com; jlr@greensfelder.com; sks@greensfelder.com



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