



Rebecca B. DeCook
Senior Attorney

Room 1575
1875 Lawrence Street
Denver, CO 80202
303 298-6357

June 5, 2002

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

Re: Case No. _____

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of TCG Kansas City, Inc.'s Request to File Business and Financial Information in Annual Report Under Seal and for Extension of Time for Filing Annual Report..

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

A handwritten signature in cursive script that reads "Rebecca B. DeCook".

Rebecca B. DeCook

Attachment

cc: General Counsel
Office of Public Counsel

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

In the Matter of the 2001 Annual Report of)
TCG Kansas City, Inc.) Case No. _____

**REQUEST TO FILE BUSINESS AND FINANCIAL INFORMATION IN
ANNUAL REPORT UNDER SEAL AND FOR EXTENSION OF TIME FOR
FILING ANNUAL REPORT**

COMES NOW, TCG Kansas City, Inc., ("TCG") and hereby requests confidential treatment of its 2001 annual report and requests an extension of time to file its 2001 annual report. In support of its request, TCG states as follows:

1. Pursuant to 4 CSR 240-10.080(4), TCG is required to file its Competitive Local Exchange Carrier Annual Report ("annual report") with this Commission.

2. TCG requests that all portions of the annual report containing statements of the number of Missouri access lines that it serves (hereafter "business information") and statements of income (hereafter "financial information"), be filed and maintained with this Commission under seal as a proprietary document.

3. 4 CSR 240-10.080(7) states:

Where a utility subject to this rule considers the information requested on the annual report form to be confidential, it must make a written request to the executive secretary to file that information under seal and state good cause for maintaining the information under seal. The executive secretary shall then, through the general counsel, present that request to the commission for approval

4. TCG has good cause to request that the business and financial information in the annual report be filed and maintained under seal, in that TCG considers the business and financial information confidential. See *Affidavit of R. Matthew Kohly* ("Affidavit") attached hereto and fully incorporated herein.

5 Public disclosure of the business and financial information would be competitively harmful to TCG. *Affidavit.*

6. TCG is a competitive local exchange company and is providing competitive telecommunications services in Missouri. *Affidavit*

7. The public disclosure of the business and financial information at a state specific level would allow TCG's competitors to determine the extent of TCG's business operations. *Affidavit.*

8. The business and financial information could be used by competitors to determine the extent of TCG's network facilities, revenues, customer base, and other competitively sensitive information to the detriment of TCG. *Affidavit.*

9. The business and financial information contained in the annual report is not publicly available. *Affidavit.*

10. The Commission has previously granted similar requests of TCG's affiliates to treat as confidential statements of cash flows, balance sheets, and income statements contained in annual reports in Case No. TE-2001-569.

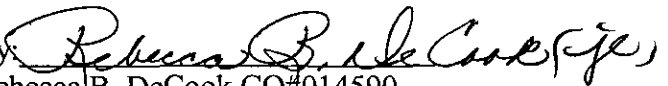
11 TCG requests that the Commission grant TCG an extension of time to file its annual report, pursuant to 4CSSR 240-10.080(8) , until such time as the Commission can consider TCG's request to file the annual report under seal.

WHEREFORE, TCG requests that all portions of the annual report containing statements of the number of Missouri access lines that it serves, "business information," and statements of cash flows, balance sheets, and income statements, "financial information", be filed and maintained with this Commission under seal as a proprietary

document pursuant to 4CSR 240-10.080(7), that the Commission grant TCG an extension of time to file the annual report until such time as the Commission can consider TCG's request to file the annual report under seal pursuant to 4CSR 240-10.080(8), and for such other relief as deemed necessary to protect the confidentiality of the annual report.

Respectfully submitted,

**AT&T COMMUNICATIONS OF
THE SOUTHWEST, INC., TCG ST.
LOUIS, INC. AND TCG KANSAS CITY,
INC.**

By: 

Rebecca B. DeCook CO#014590
1875 Lawrence Street, Suite 1575
Denver, CO 80202
(303) 298-6357 (303) 298-6301 (FAX)
decook@att.com

J. Steve Weber MO #20037
101 W. McCarty, Ste. 216
Jefferson City, MO 65101
(573)635-5198 (573)635-9442 (FAX)
jsweber@att.com

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

In the Matter of the 2001 Annual Report of)
TCG Kansas City, Inc.) Case No. _____

AFFIDAVIT OF R. MATTHEW KOHLY

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

I, R Matthew Kohly, being duly deposed and sworn, state the following to the best of my personal knowledge and/or belief:

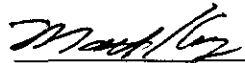
1. My name is R. Matthew Kohly, My business address is 101 West McCarty Street, Suite 216, Jefferson City, MO 65101 City, Missouri 65101.
2. I am employed by AT&T in its Law and Government Affairs organization as a District Manager – Government Affairs.
3. The annual report required to be filed by TCG Kansas City, Inc with the Public Service Commission under 4CSR 240-101.080(4) contains sensitive business information, specifically statements of the number of Missouri access lines that TCG Kansas City, Inc. serves, and sensitive financial information, specifically statements of cash flows, balance sheets, and income statements that TCG Kansas City, Inc. considers confidential.
4. Public disclosure of the business and financial information in the annual report would be competitively harmful to TCG Kansas City, Inc.
5. TCG Kansas City, Inc. is a competitive local exchange company and is providing competitive telecommunications services in Missouri.

6 The public disclosure of the business and financial information in the annual report at a state specific level would allow TCG Kansas City, Inc.'s competitors to determine the extent of TCG Kansas city, Inc.'s business operations.

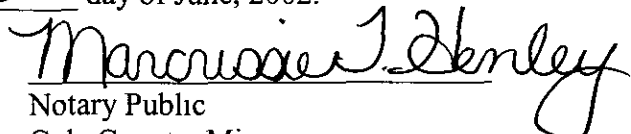
7. The business and financial information in the annual report could be used by competitors to determine the extent of TCG Kansas City, Inc.'s network facilities, operating expenses, revenues, customer base, and other competitively sensitive information to the detriment of TCG Kansas City, Inc.

8 The business and financial information contained in the annual report is not publicly available.

Further affiant sayeth naught.


R. Matthew Kohly

Subscribed and sworn to before me this 5th day of June, 2002.


Notary Public
Cole County, Missouri

My Commission expires:

8-3-2002

