## CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P. C.

ATTORNEYS AT LAW

I30 SOUTH BEMISTON, SUITE 200 ST. LOUIS, MISSOURI 63105 (314) 725-8788 FAX (314) 725-8789

LELAND B. CURTIS
PRINCIPAL

LCURTIS@COHGS.COM

June 20, 2002

Secretary of the PSC Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

Case No. TT-2002-227

Tariff No. 200200300

Dear Sir or Madam:

Enclosed for filing with the Commission in the above-referenced case is an original and nine copies of the Motion to Classify Previously Filed Letter as Highly Confidential. Please file stamp the additional copy and return it to me in the enclosed self-addressed stamped envelope.

If you have any questions, please do not hesitate to contact me.

Very truly yours,

1. I Blustis

Leland B. Curtis

LBC/kw

cc:

Parties of Record

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

In the Matter of Southwestern Bell Telephone	)	
Company's Proposed Revisions to PSC Mo.	)	Case No. TT-2002-227
No. 26, Long Distance Message	)	Tariff No. 200200300
Telecommunications Service Tariff.	)	

## MOTION TO CLASSIFY PREVIOUSLY FILED LETTER AS HIGHLY CONFIDENTIAL

Come Now TCG St. Louis and TCG Kansas City (hereinafter "TCG") and for their Motion to Classify Previously Filed Letter as Highly Confidential, state:

- 1. On June 17, 2002, TCG and NuVox Communications of Missouri, Inc. jointly filed a pleading entitled "Motion to Strike Portions of SWBT's Reply Brief."
- 2. Attached to that Motion to Strike were a series of letters between Carl Lumley, attorney for TCG, and Ms. Mimi MacDonald attorney for Southwestern Bell Telephone Company ("SWBT"). The letter dated May 1, 2002 from Ms. MacDonald to Mr. Lumley contains highly confidential information regarding the number of TCG's business lines and should be classified as highly confidential (HC) under the Protective Order established for this case.
- 3. TCG attaches to this Motion nine copies marked non-proprietary (NP) of the aforementioned May 1, 2002 letter and nine copies marked highly confidential (HC) copy of the May 1, 2002 letter. TCG asks that these NP and HC versions be substituted for the unclassified May 1, 2002 letter attached to TCG's June 17, 2002 Motion to Strike.
- 4. TCG further requests that the Commission order all parties to this case to destroy the original unclassified May 1, 2002 letter and confirm such destruction by filing a writing to that effect with the Commission.

Wherefore, TCG respectfully requests the Commission grant its Motion to Classify and order the parties to destroy the unclassified copy of the May 1, 2002 letter.

Respectfully submitted,

CURTIS, OETTING, HEINZ, GARRETT & O'KEEFE, P.C.

Carl J. Lumley, #32869 Leland B. Curtis, #20550 130 S. Bemiston, Suite 200 Clayton, Missouri 63105 (314) 725-8788 (314) 725-8789 (FAX) clumley@cohgs.com lcurtis@cohgs.com

Attorneys for TCG St. Louis and TCG Kansas City

## **CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on the 20th day of June, 2002, by placing same in the U.S. Mail, postage paid.

hela erociota

Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102

Paul G. Lane, Leo J. Bub Anthony K. Conroy, Mimi B. MacDonald Southwestern Bell Telephone One Bell Center, Room 3518 St. Louis, MO 63101

J. Steve Weber AT&T Communications of the Southwest 101 West McCarty, Suite 216 Jefferson City, MO 65101

Carol Keith NuVox Communications of Missouri, Inc. 16090 Swingley Ridge Road, Suite 500 Chesterfield, MO 63017

General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

Mark Comley, Cathleen A. Martin Newman, Comley & Ruth, P.C. 601 Monroe, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537

Richard S. Brownlee, III Hendren and Andrae, LLC 221 Bolivar Street P.O. Box 1069 Jefferson City, Mo 65102

Rebecca B. DeCook AT&T Communications of the Southwest 1875 Lawrence Street, Suite 1575 Denver, CO 80202