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November 7, 2005

Ms. Janis E. Fisher
Auditing Department
Missouri Public Service Commission
200 Madison Street, Suite 440
P.O. Box 360
Jefferson City, Missouri 65102-0360

Re: Submission of Revised Schedule 10 from SBC Missouri's
2004 Annual Report and Request to File Under Seal

Dear Ms. Fisher:

I am writing to advise that during a recent review of our access line data filed in Schedule 10 to our 2004 Annual Report, it was discovered that the access lines in our Greenwood exchange (located east of the Kansas City exchange) were inadvertently included with the line count for our Kansas City exchange. We would like to revise Schedule 10 to separately list the access lines for our Greenwood exchange.

Accordingly, we are attaching for filing with the Commission (1) a non-public version of Revised Schedule 10 for SBC Missouri's 2004 Annual Report, which is being filed under seal as "Highly Confidential;" (2) a redacted public version of the Revised Schedule 10; and (3) an affidavit supporting SBC Missouri's designation of confidential treatment for Revised Schedule 10.

Highly Confidential Designation of Information. SBC Missouri, pursuant to 4 CSR Section 240-3.540(4), has designated Revised Schedule 10 from its Annual Report (which requires carriers to provide the number of access lines by exchange and broken down by type of line) as "Highly Confidential." SBC Missouri notes that although it is filing this information with the Commission under seal, it would still be available to the Commission and its Staff. This same information was accorded confidential treatment last year for SBC Missouri's 2003 Annual Report.

As explained in more detail in the supporting Affidavit of Craig Michalski, SBC Missouri Associate Director-Regulatory Accounting (telephone 314-235-8006; e-mail: craig.michalski@sbc.com), SBC Missouri seeks confidential treatment for the access line data in Revised Schedule 10 of its 2004 Annual Report because that information is very competitively sensitive and is not publicly available in any format. Based on a supporting Staff recommendation, the Commission found good cause to permit SBC Missouri to file the same type of access line information in its year 2001 Annual Report under seal.¹ This approach is consistent with how the Commission has traditionally handled the production of confidential information within an Annual Report and is also appropriate here. SBC Missouri therefore, pursuant to 4 CSR 240-10.080(7),

¹ Order Granting Confidential Treatment, Case No. TO-2002-1020, issued September 19, 2002 at p.1.

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submits the access line information reported in Revised Schedule 10 of its 2004 Annual Report under seal and classified as "Highly Confidential."

We would appreciate your placing this Revised Schedule 10 with our 2004 Annual Report and apologize for any inconvenience our need to refile this Schedule may have caused.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Leo J. Bub".

Leo J. Bub

Attachments

cc: Mr. David Meyer (w/o report, via email)
Mr. Michael Dandino (w/o report, via email)
Mr. Craig Michalski

**AFFIDAVIT OF CRAIG MICHALSKI SUPPORTING
REQUEST FOR CONFIDENTIAL TREATMENT**


STATE OF MISSOURI)
) SS
CITY OF ST. LOUIS)

I, Craig Michalski being of lawful age, and duly sworn upon my oath, do hereby depose and state as follows:

1. My name is Craig Michalski. My business address is One SBC Center, Room 33-Y-3, St. Louis, Missouri 63101 (telephone: 314-235-8006; e-mail: craig.michalski@sbc.com). I am employed by SBC Services, Inc. and serve as Associate Director-Regulatory Accounting. I am responsible for preparing the Southwestern Bell Telephone, L.P., d/b/a SBC Missouri Annual Report, which is being submitted to the Missouri Public Service Commission with this affidavit.
2. The purpose of my affidavit is to identify the specific type of information being provided in SBC Missouri's 2004 Annual Report that is being filed under seal and to explain why that information should be kept under seal by the Commission as a closed record. As explained in further detail below, the information being filed under seal is very competitively sensitive and is not available to the public in any format.
3. Revised Schedule 10 of the Commission's Annual Report requires each local exchange carrier ("LEC") to report the number of access lines, by exchange, it has in the state, categorized into four general line types: Full Facility Based (residential and business voice grade equivalent lines); Business (pure resale, UNE and UNE-P), Residence (pure resale, UNE and UNE-P) and Public Access Lines (public, and customer-owned).
4. Access line information disaggregated in this fashion and provided at this level of geographical detail is very competitively sensitive. Specifically, it would reveal the number of access lines a carrier serves on a very specific and localized geographic basis. Accordingly, this information falls squarely within Section A(3) of the "Highly Confidential" classification of the Commission's Standard Protective Order: "market-specific information relating to services offered in competition with others."
5. This internal market-share information has been developed at great expense and is closely guarded by both incumbent LECs and CLECs. If made public, this type of information would make carriers more vulnerable to the marketing efforts of their competitors. As a result, access line information at the exchange level of detail is kept confidential by carriers in the industry and is not available to the public in any format.

6. Although SBC Missouri is filing this information with the Commission under seal, it would still be available to the Commission and its Staff.

This concludes my affidavit. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Craig Michalski
Associate Director-Regulatory Accounting

Subscribed and sworn to before me this 1st day of November, 2005.



Notary Public

My Commission Expires: January 5, 2008

