

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

STATE OF MISSOURI)

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CITY OF ST. LOUIS

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

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. 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 12th day of April, 2005


Notary Public

My Commission Expires: January 5, 2008

MARYANN PURCELL
Notary Public - Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: Jan. 5, 2008