AFFIDAVIT OF ROBERT J. MURPHY JR. SUPPORTING REQUEST FOR CONFIDENTIAL TREATMENT AT&T COMMUNICATIONS ON THE SOUTHWEST, INC.

STATE OF NEW JERSEY)	
)	SS
COUNTY OF SOMERSET)	

- I, Robert J. Murphy, Jr., of lawful age, and duly sworn upon my oath, do hereby depose and state as follows:
- 1. My name is Robert J. Murphy, Jr. My business address is One AT&T Way, Bedminster, New Jersey 07921. I am employed by AT&T Services, Inc. as Director-Accounting and I am the Assistant Secretary for AT&T Communications of the Southwest, Inc. ("the Company").
- 2. The purpose of my affidavit is to identify the specific types of information being provided in the Company's 2011 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 business and financial information being filed under seal is very competitively sensitive and is not available to the public in any format.
- 3. The Company is a competitive local exchange company ("CLEC") and provides competitive telecommunications services in Missouri.
- 4. Question 7 on page 4 of the Commission's Annual Report require each CLEC and IXC to report separately for residential and business customers, the line quantities for local voice service, including VoIP service, by exchange it has in the state and Non-Registered Nomadic IVoIP provided to other entities.
- 5. Access line information disaggregated in this fashion and provided at this level of geographic 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 the "Highly Confidential" classification of the Commission's rules governing confidential information, 4 CSR 240-2.135(1)(B)(3): "market-specific information relating to services in competition with others."
- 6. 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.

- 7. Question 6 on page 3 of the Commission's Annual Report also requires the reporting of sensitive financial information, specifically operating revenues from telecommunications services and other revenues that the Company considers highly confidential.
- 8. Public disclosure of this business and financial information in the Annual Report would be competitively harmful to the Company in that the reporting of this information at a state-specific level would allow the Company's competitors to determine the extent of the Company's business operations. It would also allow competitors to determine the extent of the Company's network facilities, operating expenses, revenues, customer base and other competitively sensitive information to the detriment of the Company.
- 9. The Company treats the business and financial information contained in the Annual Report as highly confidential and does not make it publicly available in any format.
- 10. Although the Company 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, information and belief.

Assistant Secretary

Subscribed and sworn to before this 27th day of March, 2012.

Notary Public Cynthia L. Harry

My Commission Expires: November 18, 2014

Cynthia L Hardy Notary Public of New Jersey My Commission Expires November 18, 2014