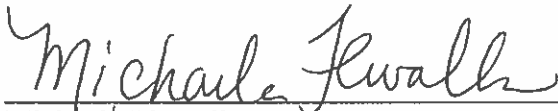


STATE OF OKLAHOMA)
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COUNTY OF OKLAHOMA)

1. My name is Michaela Flewallen. My business address is 208 South Akard, 28th Floor, Dallas, Texas 75202 (telephone: 469.785.0341; e-mail: michaela.flewallen@att.com). I am employed by Southwestern Bell Telephone Company and serve as Lead Financial Analyst. I am responsible for preparing the Southwestern Bell Telephone, d/b/a AT&T Missouri ("the "Company") 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 the Company's 2019 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. Question 6 on page 4 of the Commission's Annual Report requires each local exchange carrier ("LEC") to report the number of retail residential and business access lines, by exchange, it has in the state, as well as the quantity of lines provided in each exchange for Wholesale to Non-registered Nomadic IVoIP Providers.
4. Access line information disaggregated in this fashion and provided at this level of geographical and market segment detail is very competitively sensitive. Specifically, it would reveal the number of access lines a carrier serves on a very specific and localized geographic or market segment basis. Accordingly, this information falls squarely within the "Confidential" classification of the Commission's rules, 20 CFR 4240-2.135(2)(A)(3): "marketing analysis or other 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. Questions 5 and 7 of the Commission's Annual Report also require the reporting of sensitive financial information, including revenues from Local Services, Interexchange Services, Non-switched Telecommunications Services, Bundled or Packaged Services, Wholesale Services (e.g., Access Services), Federal USF Subsidies, State USF Subsidies and other revenues that the Company considers confidential, and its monthly contribution to Relay Missouri.
7. 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, fluctuation in customer base and other competitively sensitive information to the detriment of the Company.
8. The business and financial information contained in the Annual Report is not publicly available.
9. 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.


Michaela Flewallen
Lead Financial Analyst

Subscribed and sworn to before me this 19 day of March, 2020.




Notary Public

My Commission Expires: 4/11/2022