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October 3, 2005

The Honorable Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

Re: Case No. TO-2006-0102

Dear Judge Dale:

Attached for filing with the Missouri Public Service Commission in the above-referenced case is the Highly Confidential ("HC") version and the redacted ("NP") version of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri's Rebuttal Testimony of Craig A. Unruh.

SBC Missouri classified Revised Unruh Schedule 2(HC) and Revised Unruh Schedule 3(HC) from Mr. Unruh's Testimony because they contain private business information that cannot be found in any format in any public document and their public disclosure would harm SBC Missouri and other companies' respective business interests. These exhibits identify the specific CLECs using SBC Missouri's facilities either under a commercial agreement or through UNE-P to provide business or residential services (or both) in each of the requested exchanges. As such, the information qualifies for Highly Confidential treatment as it constitutes "information relating directly to specific customers," here SBC Missouri wholesale customers.¹

In addition, these Schedules qualify for Highly Confidential treatment on the basis that they contain "market-specific information relating to services offered in competition with others."² On the wholesale side, there are now carriers providing wholesale services (such as switching or other facilities) to other carriers for use in the provision of retail services. Revised Unruh Schedule 2(HC) and Revised Unruh Schedule 3(HC)'s identification of SBC Missouri's specific wholesale customers in each exchange for residence and/or business services would be valuable to other wholesale service providers in the marketing of their wholesale services. On the retail side, Revised Unruh Schedule 2(HC) and Revised Unruh Schedule 3(HC) may give other retail telecommunications carriers insight into the exchanges being targeted by SBC Missouri's wholesale customers that would assist these other carriers in the marketing of their own retail services.

¹ See, Protective Order, issued September 6, 2005, at p. 1.

² Id.

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Revised Exhibits B-1 and B-2 to Mr. Unruh's Testimony, which are updated versions of the two Exhibits from Mr. Unruh's Direct Testimony, are not classified as Highly Confidential because of the Commission's September 13, 2005, declassification Order.

Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

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

Leo J. Bub

Attachments

cc: Attorneys of Record