BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

n the Matter of Southwestern Bell)	
Telephone Company's Tariff Filing to)	Case No. TT-2003-0093
Initiate Residential Customer Promotion.)	Tariff File No. 200300117

SOUTHWESTERN BELL TELEPHONE, L.P. D/B/A SOUTHWESTERN BELL TELEPHONE COMPANY'S SUPPLEMENTAL MOTION FOR PROTECTIVE ORDER PURSUANT TO THE COMMISSION'S OCTOBER 9, 2002 ORDER DIRECTING FILING

COMES NOW Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company ("SWBT") and, for its Supplemental Motion for Protective Order Pursuant to the Commission's October 9, 2002 Order Directing Filing, states as follows:

- 1. On October 3, 2002, SWBT filed its Motion for Protective Order.
- 2. On October 9, 2002, the Missouri Public Service Commission ("Commission") issued its Order Granting Motion for Protective Order and Directing Filing ("Order"). In its Order, the Commission granted SWBT's Motion for Protective Order and adopted the Commission's standard protective order. The Commission also directed SWBT to file a supplement to its motion for a protective order, including a statement that none of the information for which a claim of confidentiality is made can be found in any format in any other public document, so that it complies with Commission Rule 4 CSR 240-2.085.
- 3. As SWBT stated in its original Motion for Protective Order, in the event the Commission further suspends SWBT's promotion in the above-referenced matter and this case goes to hearing, SWBT will be preparing testimony that will be filed in the above-captioned case. In preparing any testimony that may be filed in the above-reference matter, SWBT has determined that certain information should not be made public. Specifically, SWBT anticipates that certain information, although relevant, should not be made public because it is either: (a) "proprietary" in that the information contains trade secrets, as well as confidential or private technical, financial and business

information; or (b) "highly confidential" in that the information concerns: (1) material or documents that contain information relating directly to specific customers; (2) employee-sensitive information; (3) marketing analyses or other market-specific information relating to services offered in competition with other; (4) reports, work papers or other documentation related to work produced by internal or external auditors or consultants; and/or (5) strategies employed, to be employed, or under consideration in contract negotiations.

4. None of the information for which a claim of confidentiality is made can be found in any format in any other public document.

WHEREFORE, Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company submits this pleading to comply with the Commission's Order.

Respectfully submitted,

By: By: Bacon

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on October 10, 2002.

Mimi B. MacDonald

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