



September 16, 2019

Mr. Morris L. Woodruff, Secretary and Chief Regulatory Law Judge  
Missouri Public Service Commission  
200 Madison St.  
Jefferson City, MO 65102-0360

Re: Fidelity Communication Services I, Inc. and Fidelity Communication Services II, Inc.  
Numbering Request to reclaim their Local Routing Number's

Dear Judge Woodruff:

Accompanying this letter is Fidelity Communication Services I, Inc., OCN 3275 and Fidelity Communications Services II, Inc. OCN 3356; hereinafter referred to as ("FCS I and FCS II") application and motion for expedited treatment of its request for Missouri Public Service Commission ("Commission") review and reversal of the North American Number Plan Thousand-Block Pooling Administrator's ("PA") denial of FCS I and FCS II's request for numbering resources to reclaim their Local Routing Number.

Pursuant to Commission Rule 4 CSR 240-2.135(2)(B), FCS I and FCS II has designated and filed Exhibits B and C to its Application as "Confidential" because both contain highly competitively sensitive and trade secret information that FCS I and FCS II does not make available to the public in any format. These exhibits - FCS I and FCS II "Months-to-Exhaust" worksheet and its Form U1 of Form 502 for the Bourbon, St. James and Rolla rate centers, show the number of FCS I and FCS II's retail residential and business access lines by NPA-NXX within the rate center.

This sort of disaggregated access line information reveals the number of access lines FCS I and FCS II serves on a very granular and localized geographic and market segment basis. It is costly to develop, and is competitively useful information, which is why all carriers guard against its public release.


If the information reflected in Confidential Exhibits B and C to FCS I and FCS II's application were to become public, FCS I and FCS II's competitors could use it to steer their marketing and pricing strategy in an attempt to gain a competitive advantage over FCS I and FCS II in the marketplace. This is why FCS I and FCS II restricts internal access to this information to a limited subset of employees and does not make it available to the public in any

format. It is therefore appropriately treated as "Confidential" under Rule 4 CSR 240-2. I 35(2)(A)(3)'s protection for "marketing analysis or other market-specific information relating to services offered in competition with others."

Please feel free to contact me with any questions or if the Commission needs any additional information to rule on FCS I and FCS II's Application.

Very truly yours,

Fidelity Communication Services I, Inc.  
and Fidelity Communication Services II, Inc.

A handwritten signature in cursive script that reads "Carla Cooper".

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Attachments