

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Application of Southwestern)	
Bell Telephone Company d/b/a AT&T Missouri)	
For Review and Reversal of North American)	Case No. _____
Number Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold Numbering)	
Resources)	

AT&T MISSOURI'S APPLICATION AND MOTION FOR EXPEDITED TREATMENT

COMES NOW AT&T Missouri¹ and respectfully requests that the Commission issue an Order that reviews and reverses the decision of the North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc. ("NANPA"), to withhold certain numbering resources from AT&T Missouri.

The requested numbering resources are necessary to meet the needs of Jim Butler Chevrolet ("Butler Chevrolet"), located in Fenton, Missouri. The resources consist of a single thousands-block within the NPA-NXX of 636-717, in the Fenton rate center, and within any of the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999 or 9000-9999 (i.e., 636-717-3000 through 636-717-5999 or 636-717-7000 through 636-717-9999) from which one hundred (100) sequential telephone numbers can be drawn to meet Butler Chevrolet's needs. In the event that the requested numbering resources are unavailable at the time of the Commission's Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet Butler Chevrolet's needs.

¹ Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri"). AT&T Missouri files this verified Application and motion for expedited treatment pursuant to 4 CSR 240-2.060, 4 CSR 240-2.080(16), 4 CSR 240-37.040 and 47 CFR 52.15(g)(3)(iv).

In support of this Application, AT&T Missouri states as follows:

1. AT&T Missouri is a Missouri corporation with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. It may be contacted at the regular and electronic mail addresses and telephone and facsimile numbers of its attorneys, as set out under the signature block of this Application. AT&T Missouri is authorized to do business in Missouri² and its fictitious name is duly registered with the Missouri Secretary of State.³ AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo. 2000.⁴

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Timothy P. Leahy
Leo J. Bub
Robert J. Gryzmala
Attorneys for Southwestern Bell Telephone Company
d/b/a AT&T Missouri
One AT&T Center, Room 3516
St. Louis, Missouri 63101

3. Butler Chevrolet is an automobile dealership located at 759 Gravois Bluffs Road in Fenton, Missouri, in the St. Louis metropolitan area. Butler Chevrolet is in the process of expanding its dealership and, in connection with that expansion, is upgrading its

² In accordance with 4 CSR 240-2.060(1) and (G), a certified copy of Southwestern Bell Telephone Company's Certificate of Good Standing from the Missouri Secretary of State was filed with the Commission on August 15, 2007, in Case No. IK-2008-0044..

³ In accordance with 4 CSR 240-2.060(1)(E) and (G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on July 17, 2007, in Case No. TO-2002-185.

⁴ Following its June 26, 2007, Order in Case No. TO-2002-185 allowing Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri, to alter its status from a Texas limited partnership to a Missouri corporation, the Commission approved tariff revisions to reflect the new corporate name, Southwestern Bell Telephone Company, d/b/a AT&T Missouri. *See, Order Granting Expedited Treatment and Approving Tariffs*, Case No. TO-2002-185, issued June 29, 2007.

telecommunications system and facilities to accommodate the growing needs of its managers, support staff and others.

4. Butler Chevrolet has requested numbering resources consisting of one hundred (100) sequential telephone numbers. A copy of the November 6, 2007, letter from Mr. Brad M. Sowers, Owner/Dealer of Butler Chevrolet, to AT&T Missouri is attached hereto and marked as Exhibit A. As noted in the letter, Butler Chevrolet needs “one hundred consecutive MCA [i.e., Metropolitan Calling Area] DID [i.e., Direct Inward Dial] numbers” to accommodate the upgrading of its telecommunications system and facilities necessitated by its expansion. As Mr. Sowers further explains, having consecutive numbers “will provide ease of use for our staff and a more professional appearance to our customers.”

5. AT&T Missouri has no available thousands-blocks available for use from which to draw the numbering resources that would meet Butler Chevrolet’s needs. It has researched the available blocks in its Fenton rate center (FNTNMO54DS0) which serves Butler Chevrolet’s Fenton, Missouri location.

6. As a result of this research, AT&T Missouri requests that the Commission grant it numbering resources within the NPA-NXX of 636-717, and within any of the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 7000-7999, 8000-8999 or 9000-9999 (i.e., 636-717-3000 through 636-717-5999 or 636-717-7000 through 636-717-9999). AT&T Missouri has determined that the numbering resources requested herein would be compatible with Butler Chevrolet’s telecommunications service requirements. In the event that the requested numbering resources are unavailable at the time of the Commission’s Order, AT&T Missouri specifically requests that the Commission grant it any other suitable numbering resources that meet Butler Chevrolet’s needs.

7. On October 30, 2007, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Butler Chevrolet's needs. A copy of the Application is attached hereto and is marked as Exhibit B. AT&T Missouri completed the Application in accordance with the Industry Numbering Committee's Thousands-Block Pooling Assignment Guidelines and filled out the necessary Months to Exhaust and Utilization Certification Worksheet, a copy of which is attached hereto and marked as Exhibit C.

8. On or about October 30, 2007, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization criteria. A copy of that decision is attached hereto and marked as Exhibit D.

9. AT&T Missouri seeks the Commission's direction to overturn NANPA's decision to withhold numbering resources. This Commission has overturned NANPA's decision to withhold numbering resources in several cases and it should likewise do so here.

10. Under existing procedures, NANPA has asserted that it is required to accept or reject an application for resources based solely on FCC criteria. However, the FCC's March 31, 2000, Order in its Number Resource Optimization docket states that a carrier may challenge a resource denial before the appropriate state regulatory commission and a state commission may choose to affirm or overturn NANPA's decision to withhold numbering resources.⁵ Thus, the Commission has the authority to "affirm or overturn the NANPA's decision to withhold numbering resources from the carrier based on its determination of compliance with the reporting and numbering resource application requirements herein."⁶ Moreover, the FCC

⁵ Report and Order and Further Notice of Proposed Rule Making, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, March 31, 2000, Appendix A; *see also*, 47 CFR 52.15(g)(3)(iv).

⁶ *Id.*

determined that states may overturn NANPA's decision to withhold numbering resources from the carrier where there is a verifiable need for the carrier to satisfy a specific customer request:

We also agree with WinStar that a carrier should be able to get additional numbering resources when there is a verifiable need due to the carrier's inability to satisfy a specific customer request. We therefore clarify that states may also grant relief if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.⁷

11. The FCC further explained in its March 31, 2000, Order that a "[c]arrier may demonstrate such a need by providing the state with documentation of the customer request and current proof of the utilization in the rate center" and that states "may grant requests for customers seeking contiguous blocks of numbers."⁸ Moreover, although the FCC declined to establish a specific timeframe for states to act on these requests, the FCC indicated "in most instances, 10 business days from receipt of request that the state determines to be sufficiently detailed and complete will be sufficient time to review and act upon safety valve requests."⁹

12. Further, this Application complies with 4 CSR 240-37.040. AT&T Missouri has attached hereto its "Months-to-Exhaust Worksheet" indicating the utilization for the Fenton rate center encompassing the preceding six months and projected monthly utilization for the next twelve months. 4 CSR 240-37.040(1)(A)1. *See*, Exhibit C. AT&T Missouri has also attached hereto its most recently-filed FCC Form U1 of Form 502 for the Fenton rate center. 4 CSR 240-37.040(1)(A)2. *See*, Exhibit E (HC). Finally, AT&T Missouri attaches copies of its originally-filed request to NANPA (i.e., its Thousands-Block Application Form, Part 1a) and NANPA's denial of that request. 4 CSR 240-37.040(1)(A)3. *See*, Exhibits B and D. These materials and the instant Application demonstrate a verifiable need for the numbering resources requested herein.

⁷ Third Report and Order and Second Order on Reconsideration, In the Matter of Numbering Resource Optimization, CC Docket No. 99-200, et al., December 12, 2001, paragraph 64; *see also*, 47 CFR 52.15(g)(4).

⁸ *Id.*

⁹ *Id.* at paragraph 66.

In connection with this request, AT&T Missouri has exhausted all other available remedies designed to conserve numbering resources. 4 CSR 240-37.040(1)(A)4.

13. AT&T Missouri does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

14. AT&T Missouri does not have any annual report or assessment fees that are overdue in Missouri.

15. AT&T Missouri seeks expedited treatment and requests that the Commission act on this request within ten (10) business days as envisioned by the FCC, or as soon thereafter as is practicable. Butler Chevrolet “need[s] to activate [the] DID blocks by November 30.” Exhibit A. In order to accommodate Butler Chevrolet’s needs, the Commission must issue its order as soon as possible, so that AT&T Missouri will have enough time to file a new request with NANPA for the release of the numbering resources to AT&T Missouri described herein, both to meet Butler Chevrolet’s needs and so that AT&T Missouri and any other telecommunications service providers that provides service via a switch can program their switches. AT&T Missouri filed this request for expedited treatment as soon as it could have. Specifically, AT&T Missouri filed this pleading after NANPA rejected AT&T Missouri’s request for numbering resources and AT&T Missouri determined that it was not feasible to implement a technological alternative.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA’s previous determination in this matter within ten (10) business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the telecommunications needs of Jim Butler Chevrolet and, in the event that the requested resources

are then unavailable, to release such other suitable blocks as will meet Jim Butler Chevrolet's needs.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

BY 

TIMOTHY P. LEAHY #36197

LEO J. BUB #34326

ROBERT J. GRYZMALA #32454

Attorneys for Southwestern Bell Telephone Company

d/b/a AT&T Missouri

One AT&T Center, Room 3516

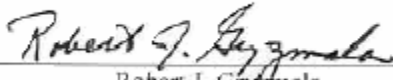
St. Louis, Missouri 63101

314-235-6060 (Telephone)/314-247-0014 (Facsimile)

robert.gryzmala@att.com (E-Mail)

CERTIFICATE OF SERVICE

Copies of this document and all attachments thereto were served on the following by e-mail on November 9, 2007.


Robert J. Gryzmala

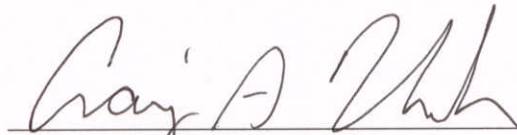
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COUNTY OF COLE)
)
STATE OF MISSOURI) SS

VERIFICATION

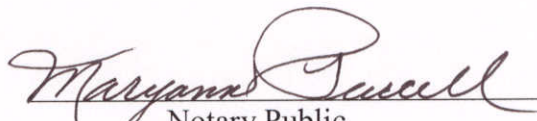
I, Craig A. Unruh, first being duly sworn, state on my oath that I am over the age of twenty-one years, sound of mind, and Executive Director-Regulatory of Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri"). I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read the foregoing document and I am informed and believe that the matters contained therein are true.


Craig A. Unruh

On this 9th day of November, 2007, before me, a Notary Public, personally appeared Craig A. Unruh, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and Executive Director-Regulatory of AT&T Missouri, he signed the foregoing document as Executive Director-Regulatory of AT&T Missouri and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

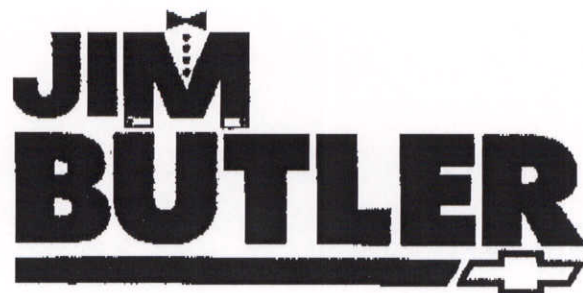
IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.




Notary Public

My Commission Expires: January 5, 2008

MARYANN PURCELL
Notary Public - Notary Seal
STATE OF MISSOURI
City of St. Louis
My Commission Expires: Jan. 5, 2008



November 06, 2007

AT&T Missouri

Jim Butler Chevrolet is expanding our dealership located at 759 Gravois Bluffs Blvd, in Fenton, Missouri. Each employee will need two lines and we require additional lines for managers, conference rooms, fax services, and courtesy desks. Our goal is to maintain the current 4-digit dialing pattern, and we are therefore requesting one hundred consecutive MCA DID numbers.

Having consecutive numbers will provide ease of use for our staff and a more professional appearance to our customers.

We need to activate this DID blocks by November 30, 2007. AT&T is our chosen service provider and we understand that they might escalate this request to the state utility commission. It's important that we know at least a month before our turn-up date whether or not this request will be granted.

Sincerely,

A handwritten signature in black ink, appearing to read "BSowers".

Brad M. Sowers Owner / Dealer Jim Butler Chevrolet

759 Gravois Bluffs Blvd Fenton MO 63026 (636)-349-3222

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1**Thousands-Block Application Form**
Part 1A**Type of Application (check one):** ☒ **New** ☐ **Changeⁱ** ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: AT&T-SOUTHWESTHeadquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Contact Name: CONNIE MCNAUGHTON/N. WHITTINGTONContact Address: 2600 CAMINO RAMON, 1S900 E City SAN RAMON State CA Zip 94583Phone: 925 824-5627 Fax: 925 355-9268 E-Mail: cm3123@att.com**Pooling Administratorⁱⁱ:**Contact Name: GENEVIEVE PAULINOContact Address: 800 SUTTER STREET, Suite 571 City CONCORD State CA Zip 94520Phone: 925-363-7652 Fax: 925-363-7683 E-Mail: genevieve.paulino@neustar.com**1.2 General Information****Check one: No LRN needed** ☒ **LRN neededⁱⁱⁱ** _____NPA: 636 LATA: 520 OCN^{iv}: 9533 Parent Company's OCN 9533Number of Thousands-Blocks Requested: 1Switch Identification (Switching Entity/POI)^v: FNTNMO54DS0 City or Wire Center Name _____Rate Center^{vi}: FENTON Rate Center Sub Zone: _____**1.3 Dates**Date of Application^{vii}: 10/30/2007 Requested Block Effective Date^{viii}: 30 DAY EXPEDITERequest Expedited Treatment? (See Section 8.6) Yes ☒ No ☐**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: ILEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: WIRELINE

c) Thousands-Block(s) (NXX-X) assignment preference (optional) _____

d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any _____

e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping (the remainder of the blocks will be given to the pool) _____.

1.5 Type of Request

Initial block for rate center: Yes _____, If Yes attach evidence of authorization and proof of capability to provide Service within 60 days

Growth block for rate center: Yes XXX, If Yes, attach months to exhaust worksheet

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A**Change block: Yes_____, If Yes, indicate NPA-NXX-X, type of and reason for change:

Disconnect block: Yes_____, If Yes, list NPA-NXX-X _____

Remarks: ___DEDICATED CUSTOMER_- REQUESTING EXPEDITED EFFECTIVE DATE._____

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines ATIS-0300066.

SIGNATURE ON FILE

Signature of Block Applicant

CODE ADMINISTRATOR

Title

10/30/2007

Date

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1

Thousands-Block Application Form

Part 1A

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under “Block Applicant” the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator’s name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the Telcordia™ LERG™ Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by Telcordia™ Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLI™ tandem of the facilities based provider^{ix}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.

Tracking Number: _____

TBPAG Attachment 1 – March 19, 2007
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A**

Foot Notes:

ⁱ Identify type of and reason for change(s) in Section 1.5.

ⁱⁱ The Pool Administrator is available to assist in completing these forms.

ⁱⁱⁱ A CO Code application will also need to be submitted to the PA

^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code(s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).

^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.

^{vi} Rate Center name must be a tariffed Rate Center.

^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.

^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the PSTN prior to the effective date of the block(s).

^{ix} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

Appendix 3 - Modified August 6, 2001

Exhibit C

MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹ (Thousands-Block Number Pooling Growth Block Request)

Date: 10/30/2007 OCN: 9533 Company Name: AT&T-SOUTHWEST

Rate Center: FENTON

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NXX: 636, 305, 326, 343, 349, 717, BLOCKS: 636-717-0, 1, 2, 6

Name of Block Applicant: CONNIEMCNAUGHTON/NATALIE WHITTINGTON Signature: SIGNATURE ON FILE

Title: CODE ADMINISTRATOR Telephone No.: (925) 824-5627 FAX No.: (925) 355-9268 E-Mail: cm3123@ATT.COM

A. Available Numbers: 13750

B. Assigned Numbers: 28713

C. Total Numbering Resources: 44000

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0

List excluded Code(s) or Block(s): 0

		Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
E. Growth History – Previous 6 months ²		<u>168</u>	<u>-39</u>	<u>-26</u>	<u>120</u>	<u>-8</u>	<u>-182</u>						
F. Forecast – Next 12 months ³		<u>0</u>	<u>5</u>	<u>1048</u>	<u>0</u>	<u>14</u>	<u>43</u>	<u>38</u>	<u>35</u>	<u>27</u>	<u>0</u>	<u>0</u>	<u>0</u>
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):		<u>185</u>											
H. Months to Exhaust ⁴		$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$						=	<u>74.324</u>				
I. Utilization ⁵		$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$						* 100	=	<u>65.257%</u>			

Explanation: - FORECAST Actual Value M1 (- 445) Actual Value M4 (- 10) Actual Value M10 (- 1) Actual Value M11 (- 62) Actual Value M12 (- 2)

DEDICATED CUSTOMER – 1 BLOCK REQUEST - BUTLER

¹ A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

² Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

³ Forecast of TNs needed in each following month, starting with the most recent month as Month #1.

⁴ To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, § 52.15 (g) (3) (iii)).

⁵ Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g)(3)(ii))

636-FENTON-MO


BUTLER CHEVROLET

Pooling Administration System - Microsoft Internet Explorer provided by AT&T

File Edit View Favorites Tools Help

Back Forward Stop Home Search Favorites Refresh Print Mail New Tab

Address <https://www.nationalpooling.com/pas/frames-index.jsp> Links >>



- Request For Resources
 - New
 - Modify
 - Disconnect
 - Block Transfer
- Confirm Block(s) in Service (Part 4)
- Search Forms
- Submit Forecast
- User Profile
- Donate Blocks
- Reports

Question? E-mail us
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Pooling Administration System

cmcnaughton1 (SP) [Sign Out](#)

Months to Exhaust and Utilization Certification Worksheet - TN Level (Continued)

Your utilization calculates to **65.257 percent**. The FCC requires a utilization of **75.000 percent**.

Select One Option and Submit

- ☐ Return to the Months To Exhaust Form
- ☐ Discard all the information provided for the request and start with a fresh Part 1A
- ☒ State Waiver Option

EXHIBIT E
IS
HIGHLY CONFIDENTIAL
IN ITS ENTIRETY