

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

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

**SOUTHWESTERN BELL TELEPHONE, L.P., D/B/A AT&T MISSOURI'S  
APPLICATION AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW AT&T Missouri<sup>1</sup> and 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), and respectfully requests that the Missouri Public Service Commission ("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 consist a single thousands-block within the NPA-NXX of 636-461, in the Imperial rate center, and within any of the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999 or 9000-9999 (i.e., 636-461-3000 through 636-461-9999) from which one hundred (100) sequential telephone numbers can be drawn in order to meet the needs of Boemler Chevrolet ("Boemler"), located in Arnold, Missouri. 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 Boemler's needs.

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<sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri").

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

1. AT&T Missouri is a Texas limited partnership,<sup>2</sup> duly authorized to conduct business in Missouri,<sup>3</sup> with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri, 63101. AT&T Missouri is authorized to do business in Missouri and its fictitious name is duly registered with the Missouri Secretary of State.<sup>4</sup> 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.

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, L.P.,  
d/b/a AT&T Missouri  
One AT&T Center, Room 3516  
St. Louis, Missouri 63101

3. Boemler is an automobile dealership located in Arnold, Missouri, in the St. Louis metropolitan area. Boemler is in the process of upgrading its telecommunications system and facilities to subscribe to SmartTrunk® service for its voice and data communications.

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<sup>2</sup> AT&T Missouri filed a copy of its Limited Partnership Agreement with the Commission on October 12, 2001. See, In the Matter of the Application of Southwestern Bell Telephone Company To Transfer Property and Ownership of Stock Pursuant to Section 392.200, RSMo., Case No. TO-2002-185.

<sup>3</sup> AT&T Missouri filed a certificate from the Missouri Secretary of State Certifying that Southwestern Bell Telephone, L.P. is a foreign limited partnership that is duly authorized to transact business in the State of Missouri with the Commission on January 7, 2002. See, In the Matter of the Application of Southwestern Bell Telephone Company to Transfer Property and Ownership of Stock Pursuant to Section 392.300, RSMo., Case No. TO-2002-185.

<sup>4</sup> AT&T Missouri filed a copy of its Limited Partnership Agreement with the Commission on March 20, 2007. See, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri For Review and Reversal Of North American Number Plan Administrator’s Decision to Withhold Numbering Resources, Case No. TO-2007-0343.

4. Boemler has requested numbering resources consisting of one hundred (100) sequential telephone numbers within the NPA-NXX of 636-461, and within any of the XXXX ranges of 3000-3999, 4000-4999, 5000-5999, 6000-6999, 7000-7999, 8000-8999 or 9000-9999 (i.e., 636-461-3000 through 636-461-9999). AT&T Missouri has researched the available blocks in its Imperial rate center (IMPRMO58RS2) which serves Boemler's Arnold, Missouri location. AT&T Missouri has no available thousands-blocks available for use that meet Boemler's needs. In order to best meet Boemler's needs, AT&T Missouri requests that the Commission grant it the numbering resources requested herein. 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 Boemler's needs.

5. A copy of the June 5, 2007, letter from Mr. Mike Mudd, Boemler's Service Manager/Information Technology Director, to AT&T Missouri is attached hereto and marked as Exhibit A. As noted in the letter, Boemler needs "a block of 100 consecutive Direct Inward Dial (DID) numbers for a PRI Smart Trunk" to accommodate the upgrading of its telecommunications system and facilities and securing the "Metropolitan Calling Area in to St. Louis." AT&T Missouri has determined that the numbering resources requested herein would be compatible with Boemler's telecommunications service requirements.

6. On May 30, 2007, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet Boemler'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.

7. On or about May 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.

8. 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.

9. 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 reaffirm or overturn NANPA's decision to withhold numbering resources.<sup>5</sup> 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."<sup>6</sup> Moreover, the FCC 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.<sup>7</sup>

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<sup>5</sup> 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)).

<sup>6</sup> Id.

<sup>7</sup> Third Report and Order and Second Order on Reconsideration in CC Docket Number 96-98 and CC Docket Number No. 99-200, In the Matter of Numbering Resource Optimization, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996, and Telephone Number Portability, CC Docket Number 99-200, et al., December 12, 2001, paragraph 64; (see also, 47 CFR 52.15(g)(4)).

10. 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.”<sup>8</sup> 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.”<sup>9</sup>

11. 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 IMPRMO58RS2 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 IMPRMO58RS2 rate center. 4 CSR 240-37.040(1)(A)2. See, Exhibit E. 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. 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).

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<sup>8</sup> Id.

<sup>9</sup> Id. at paragraph 66.

12. AT&T Missouri does not have any pending 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.

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

14. 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. Boemler anticipates “an installation date of June 20, 2007.” Exhibit A. In order to accommodate Boemler’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 Boemler’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 business days as envisioned by the FCC, and instruct NANPA to release the numbering resources described herein to meet the request of Boemler and, in the event that the requested resources are then unavailable, to release such other suitable blocks as will meet Boemler’s needs.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

TIMOTHY P. LEAHY #36197

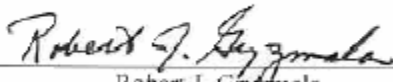
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**CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following by e-mail on June 6, 2007.

  
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4040 JEFFCO BOULEVARD ■ P.O. BOX 216 ■ ARNOLD, MISSOURI 63010-0216

(636) 464-5353 ■ FAX (636) 464-2731

Dear AT&T,

I am writing this letter in support of our request for a block of 100 consecutive Direct Inward Dial (DID) numbers for a PRI Smart Trunk with the exchange of 636- 461. You have informed me that a consecutive block of 100 Metropolitan Calling Area, DID numbers are not available to you and that you will have to ask for permission from our state regulators to secure them. We are upgrading our phone switch and need the extended Metropolitan Calling Area in to St. Louis. If we can't get the DID numbers with the extended Metropolitan Calling Area, we will have to change our phone numbers. We would like consecutive numbers to make the switch to the PRI easier on our staff and customers.

I am requesting a speedy response as we are looking for an installation date of June 20, 2007.

Thank you,

A handwritten signature in dark ink, appearing to read "Mike Mudd", is written over a light-colored background.

*Mike Mudd*

Service Manager

Boemler Chevrolet

Voice: 636-464-5353 x3300

Toll Free: 866-464-5353

Fax: 636-467-2609

Email: [mike@boemler.com](mailto:mike@boemler.com)

Web: [www.boemler.com](http://www.boemler.com)



Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1**Thousands-Block Application Form**  
**Part 1A****Type of Application (check one):** ☒ **New** ☐ **Change**<sup>i</sup> ☐ **Disconnect****GENERAL APPLICATION INFORMATION****1.1 Contact Information:****Block Applicant:**Company Name: ATT-SOUTHWEST  
Headquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583  
Contact Name: CONNIE MCNAUGHTON/NATALIE WHITTINGTON  
Contact Address: 2600 CAMINO RAMON, 1S900 E City SAN RAMON State CA Zip 94583  
Phone: 925 824-5627 Fax: 925 355-9268 E-Mail: cm3123@att.com**Pooling Administrator<sup>ii</sup>:**Contact Name: GENEVIEVE PAULINO  
Contact Address: 800 SUTTER STREET, Suite 571 City CONCORD State CA Zip 94520  
Phone: 925-363-7652 Fax: 925-363-7683 E-Mail: genevieve.paulino@neustar.com**1.2 General Information****Check one:** No LRN needed ☒ **LRN needed**<sup>iii</sup> \_\_\_\_\_NPA: 636 LATA: 520 OCN<sup>iv</sup>: 9533 Parent Company's OCN 9533  
Number of Thousands-Blocks Requested: 1Switch Identification (Switching Entity/POI)<sup>v</sup>: IMPRMO58RS2 City or Wire Center Name \_\_\_\_\_  
Rate Center<sup>vi</sup>: IMPERIAL Rate Center Sub Zone: \_\_\_\_\_**1.3 Dates**Date of Application<sup>vii</sup>: 05/30/2007 Requested Block Effective Date<sup>viii</sup>: 06/20/2007  
Request Expedited Treatment? (See Section 8.6) Yes XX 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: WIRELIN
- c) Thousands-Block(s) (NXX-X) assignment preference (optional) 636-461-3,4,5,6,7,8, OR 9. SSC J SERVICE. GROWTH for dedicated customer, BOEMLER CHEVROLET.
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment, if any ANY BLOCKS THAT DO NOT HAVE A NPA-NXX SSC J.
- 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

Tracking Number: \_\_\_\_\_

TBPAG Attachment 1 – March 19, 2007  
ATIS-0300066.at1**Thousands-Block Application Form  
Part 1A**Growth block for rate center: Yes XXX. If Yes, attach months to exhaust worksheetChange block: Yes \_\_\_\_\_, If Yes, indicate NPA-NXX-X, type of and reason for change:  
\_\_\_\_\_

Disconnect block: Yes \_\_\_\_\_, If Yes, list NPA-NXX-X \_\_\_\_\_

Remarks: \_\_\_\_\_

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

05/30/2007

Date

Tracking Number: \_\_\_\_\_

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

## Thousands-Block Application Form

### Part 1A

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**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<sup>ix</sup>. 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:

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<sup>i</sup> Identify type of and reason for change(s) in Section 1.5.

<sup>ii</sup> The Pool Administrator is available to assist in completing these forms.

<sup>iii</sup> A CO Code application will also need to be submitted to the PA

<sup>iv</sup> 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).

<sup>v</sup> 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.

<sup>vi</sup> Rate Center name must be a tariffed Rate Center.

<sup>vii</sup> 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.

<sup>viii</sup> 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).

<sup>ix</sup> 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 <sup>1</sup> (Thousands-Block Number Pooling Growth Block Request)

Date: 05/29/2007 OCN: 9533 Company Name: ATT-SOUTHWEST

Rate Center: IMPERIAL

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA:636- 461, 464, 467, 525, blocks: 636-461-0, 1, 2, 636-467-2, 5, 7, 8, 9, 636-525-0

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: 7000

B. Assigned Numbers: 11093

C. Total Numbering Resources: 19000

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 <sup>2</sup>		<u>-37</u>	<u>-55</u>	<u>-31</u>	<u>-47</u>	<u>9</u>	<u>18</u>						
F. Forecast – Next 12 months <sup>3</sup>		<u>0</u>	<u>33</u>	<u>1010</u>	<u>0</u>	<u>0</u>	<u>0</u>	<u>-22</u>	<u>1</u>	<u>-27</u>	<u>-22</u>	<u>-28</u>	<u>-46</u>
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):		<u>173.83</u>											
H. Months to Exhaust <sup>4</sup>		$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$						=	<u>40.26</u>				
I. Utilization <sup>5</sup>		$\frac{\text{Assigned Numbers (B) – Excluded Numbers (D)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$						* 100	=	<u>58.38%</u>			

Explanation: **-Customer requesting SSC J block. Preference is 636-461-5 which AT&T is the LERG ASSIGNEE. FORECAST Actual Value M1(- 458) M4 (- 9) M% (-15) M6 (-10). Dedicated Customer Boemler Chevrolet. 636 - IMPERIAL - MO -ATT TR# MO00000794**

<sup>1</sup> 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.

<sup>2</sup> 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.

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

<sup>4</sup> 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)).


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

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

File Edit View Favorites Tools Help

Back Forward Stop Reload Home Search Favorites RSS Print Mail News Groups

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 **58.384 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

Internet

start Team-Link Messenger... Sent Items - Microsof... 6 Internet Explorer

3:11 PM  
Wednesday  
5/30/2007

**EXHIBIT E**  
**IS**  
**HIGHLY CONFIDENTIAL**  
**IN ITS ENTIRETY**