May 5, 2023

Missouri Public Service Commission

Honorable Judge Morris L. Woodruff

200 Madison Street

Jefferson City, MO 65102

Re: Teleport Communications America, LLC -- Application for Numbering Relief

Dear Judge Woodruff,

With this letter Teleport Communications America, LLC (“Teleport”), has filed an application seeking the Commission’s review and reversal of the North American Number Plan Thousands-Block Pooling Administrator’s (“NANPA”) decision concerning a request for telephone numbers to serve BJC Healthcare in St. Louis, Missouri.

Pursuant to Commission rule 4 CSR 240-2.135(2)(B), we have designated and filed Exhibit E to the application as “Confidential” because it contains competitively sensitive information not available to the public in any format. The exhibit, FCC Form U1 of Form 502 for the Harvester, Missouri, Rate Center, which is being provided in support of the application as required by 4 CSR 240-28.016(1)(B), shows the number of Teleport retail residential and business access lines by NPA-NXX within the rate center.

Access line information disaggregated in this fashion reveals the number of access lines a carrier serves on a very specific and localized geographic or market segment basis. This internal market-share information has been developed at great expense and is closely guarded by all carriers. If made public, this type of information would make carriers more vulnerable to the marketing efforts of their competitors. As a result, access line information at this level of detail is kept confidential by carriers in the industry and is not available to the public in any format.

Accordingly, this information falls squarely within the “Confidential” classification of 4 CSR 240-2.135(2)(A)(3): “marketing analysis or other market-specific information relating to services offered in competition with others.

Please do not hesitate to contact me at your earliest convenience if you or anyone at the Commission have any questions or concerns regarding this matter.

Sincerely,

Bruce A. Ney

AVP – Senior Legal Counsel

Attachments