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February 7, 2018

Missouri Public Service Commission
Honorable Judge Morris L. Woodruff
200 Madison Street
Jefferson City, MO 65102

Re: St. Luke's Hospital Number Request

Dear Judge Woodruff,

With this letter Southwestern Bell Telephone Company, d/b/a AT&T Missouri, has filed an application seeking the Commission's review and reversal of the North American Number Plan Thousands-Block Pooling Administrator's decision concerning a request for telephone numbers to serve St. Luke's Hospital in Kansas City.

Pursuant to Commission rule 4 CSR 240-2.135(2)(B), we have designated and filed Exhibit E to this application as "Confidential" because it contains very competitively sensitive information not available to the public in any format. This exhibit, the FCC Form U1 of Form 502 for the Kansas City, Missouri rate center, shows the number of AT&T Missouri 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 call me with any questions or if anything further is needed.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Leo J. Bub".

Leo J. Bub

Attachments

AT&T

**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 Number)	Case No. _____
Plan Thousands-Block Pooling)	
Administrator's Decision to Withhold)	
Numbering Resources)	

AT&T MISSOURI'S APPLICATION

AT&T Missouri¹ respectfully requests the Commission issue an Order reviewing and reversing NANPA's² decision to withhold certain numbering resources from AT&T Missouri.

The requested numbering resources are necessary to meet the expanding telecommunications needs of St. Luke's Hospital ("St. Luke's") at its Kansas City, Missouri location. These resources consist of a one thousands-block from which five hundred (500) consecutive numbers can be drawn within (1) the 816 NPA, (2) the Kansas City rate center, and (3) the 816-XX1-XXXX range of 6000 or 7000. AT&T Missouri further requests that if such specific resources are not available when the Commission issues its order, the Commission should direct NANPA to provide such resources as are available to meet St. Luke's numbering resource needs. AT&T Missouri also respectfully asks to expedite this request.

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

1. AT&T Missouri is a Delaware corporation with its principal Missouri office at 1010 Pine Street, Room 19E-D-01, St. Louis, Missouri 63101. It may be contacted at the regular and

¹ Southwestern Bell Telephone Company d/b/a AT&T Missouri shall be referred to in this filing as "AT&T Missouri". AT&T Missouri files this verified Application pursuant to 4 CSR 240-2.060, 4 CSR 240-37.040 and 47 CFR 52.15(g).

² The North American Numbering Plan Thousands-Block Pooling Administrator, NeuStar, Inc., shall be referred to in this filing as "NANPA".

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 Missouri³ and its fictitious name is duly registered with the Missouri Secretary of State.⁴ 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.

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

Leo J. Bub
Attorney for Southwestern Bell Telephone Company
d/b/a AT&T Missouri
1010 Pine Street, Room 19E-D-01
St. Louis, Missouri 63101

3. This Application is prompted by St. Luke's expansion of its voice network at its Kansas City, Missouri location. As a result, St. Luke's is in need of additional numbering resources for its hospital that would be consistent with St. Luke's larger voice network serving its entire health system across the greater Kansas City metropolitan area. A letter from Ms. Olga Gencheva, St. Luke's Health System Network Engineer, outlines St. Luke's need for 500 consecutive DID lines to expand its voice network at the hospital. *See*, Exhibit A, attached hereto. St. Luke's is requesting 500 consecutive DID numbers drawn from the Kansas City rate center in the 816 NPA with an XX1-XXXX range of 6000 or 7000.

³ 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. The company has since been converted into a Delaware corporation. *See*, Certificate of Conversion from the Missouri Secretary of State, dated October 3, 2012 (which was filed with the Commission on December 4, 2012 in Case No. IO-2013-0323).

⁴ 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. AT&T Missouri has researched the available numbering resources in the Kansas City, Missouri rate center and has determined that it has no numbers available to meet St. Luke's needs.

5. Consequently, AT&T Missouri requests that the Commission grant it numbering resources consisting of a one thousands-block from which five hundred (500) consecutive numbers can be drawn meeting the criteria expressed in paragraph 3 above.

6. On January 26, 2018, AT&T Missouri submitted a Thousands-Block Application Form, Part 1A, for the numbering resources assignment necessary to meet St. Luke's needs. (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. (Exhibit C)

7. On January 26, 2018, NANPA denied the request on the grounds that AT&T Missouri had not met the utilization and/or months-to-exhaust criteria. (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 AT&T Missouri respectfully submits that 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 affirm or overturn NANPA's decision to withhold numbering resources.⁵ Thus, the

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).

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 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

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.”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

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 Kansas City rate center encompassing both 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 this rate center. 4 CSR 240-

⁶ *Id.*

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).

⁸ *Id.*

⁹ *Id.* at paragraph 66.

37.040(1)(A)(2). *See*, Exhibit E(Confidential). 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, respectively. These materials and the instant Application demonstrate a verifiable need for the requested numbering resources. 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).

12. AT&T Missouri has no final unsatisfied judgments or decisions against it from any state or federal agency or court which involve Missouri retail 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. St. Luke's has explained that these numbers are needed to expand the voice network at their location in Kansas City, Missouri *See*, Exhibit A.

WHEREFORE, AT&T Missouri respectfully requests that the Commission overturn NANPA's previous determination in this matter and instruct NANPA to release the numbering resources described herein. AT&T Missouri further requests that if such specific resources are not available when the Commission issues its order, the Commission should direct NANPA to provide such resources as are available to meet the numbering resource needs of St. Luke's Health System.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Leo M".

SOUTHWESTERN BELL TELEPHONE
COMPANY
LEO J. BUB #34326

Attorney for Southwestern Bell Telephone
Company
d/b/a AT&T Missouri
1010 Pine Street, Room 19E-D-01
St. Louis, Missouri 63101
314-396-3679 (tel.)
leo.bub@att.com

CERTIFICATE OF SERVICE

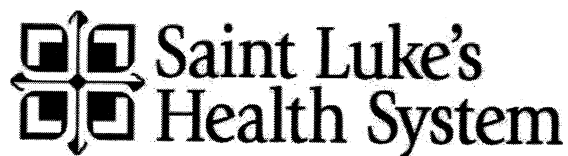
Copies of this document and all attachments thereto were served on the following by e-mail on February 6, 2018.

A handwritten signature in blue ink, appearing to read "Leo M".

Leo J. Bub

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Office Of The Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov



To: AT&T
From: Olga Gencheva
CC: Demetria White-Gaulden
Date: October 04, 2017
Re: Safety Valve Request

The Saint Luke's Hospital in Kansas City, Mo is in need of expanding its voice network.

SLHS has requested AT&T for additional 500 DID numbers. AT&T has replied that there are no 500 consecutive DID numbers available at this time.

This facility is also part of a larger voice network that utilizes approximately 16,000 DID numbers from different Central Office locations across the greater Kansas City metro area therefore, specific DNs are being requested in order to fit into this larger dial plan.

Please treat this letter as a Safety Valve Request for 500 consecutive DID numbers in following ranges:

816-XX1-7000 through 816-XX1-7599 (ext 17000 through 17599) – preferred option.
816-XX1-6500 through 816-XX1-6999 (ext 16500 through 16999) – preferred option.

The addition DID numbers are needed urgently as phone number shortage affects patient care.

Please advise when these number ranges are available.

A handwritten signature in cursive script that reads "Olga Gencheva".

Olga Gencheva
Network Engineer II
Information Services
Saint Luke's Health System
800 NW Chipman Road, Suite 5950
Lee's Summit, MO 64063

Phone (816) 251-6489
E-mail ogencheva@saint-lukes.org

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
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 CORPORATIONHeadquarters Address: 2600 CAMINO RAMON City SAN RAMON State CA Zip 94583Contact Name: PATTY BERRISContact Address: 5001 EXECUTIVE PARKWAY RM 3W200M City SAN RAMON State CA Zip 94583Phone: 925-543-1528 Fax: 925-355-9268E-Mail: pb1986@att.com**Pooling Administratorⁱⁱ:**

Contact

Name: Kevin GatchellContact Address: 1800 SUTTER STREET, SUITE 571 City CONCORD State CA Zip 94520Phone: 925-363-7653 Fax: 925-363-7686E-Mail: kevin.gatchell@neustar.biz**1.2 General Information`****Check one: No LRN needed** ☒ **LRN neededⁱⁱⁱ** _____NPA: 816 LATA: 524 OCN^{iv}: 9533 Parent Company's OCN 9533Number of Thousands-Blocks Requested: 1Switch Identification (Switching Entity/POI)^v: KSCYMO55DS3 City or Wire Center Name _____Rate Center^{vi}: KANSASCITY Rate Center Sub Zone: _____**1.3 Dates**Date of 01/26/2018 Requested Block Effective Date^{vii}: _____Request Expedited Treatment? (See Section 8.6) Yes ☒ No ☐**1.4 Type of Service Provider Requesting the Thousands-Block:**a) Type of Service Provider: LEC (LEC, IXC, CMRS, Other)b) Primary type of service Blocks to be used for: WIRELINEc) Thousands-Block(s) (NXX-X) preference NPA-NX1-6XXX or 7XXXd) Thousands-Block(s) (NXX-X) that is undesirable for this assignment, if All Others

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) _____.

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
ATIS-0300066.at1**Thousands-Block Application Form
Part 1A****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__**X**__, 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 _____

1.6 Block Return

-
- a) Is this block Contaminated: Yes____ or No____
 - b) If Yes how many TNs are NOT available for assignment:____
 - c) Have all new Intra SP ports been completed in the NPAC: Yes____ or No____
 - d) Has this block been protected from further assignment: Yes____ or No____
-

Remarks: **SAFETY VALVE WAIVER REQUEST FOR ST LUKE'S HEALTH SYSTEM**

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) available on the ATIS web site (www.atis.org/inc) or by contacting inc@atis.org as of the date of this application.

<u>PATTY BERRIS</u>	<u>CODE ADMINISTRATOR</u>	<u>01/26/2018</u>
Signature of Block Applicant	Title	Date

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
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^{viii}. 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, inter-exchange 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.

Section 1.6 Service Providers shall indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA must seek a new block holder. If question c and/or d have a response of No, the request for return shall be denied.

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

Tracking Number: _____

TBPAG Attachment 1 – February 11, 2008
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} 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).

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

Appendix 3 - Modified August 6, 2001**MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORKSHEET – TN Level ¹
(Thousands-Block Number Pooling Growth Block Request)**

Date 01/26/2018 OCN: 9533 Company Name: SOUTHWESTERN BELL
Rate Center: KANSASCITY

List all Codes NPA(s)-NXXs and Blocks NPA(s)-NXX-X(s): NPA/NXX (153); NPA/NXX-X (520)

Name of Block Applicant: Patty Berris Signature: SIGNATURE ON FILE

Title: MANAGER-NETWORK SERVICES Telephone No.: 925-543-1528 FAX No.: 925-355-9268

E-Mail: pb1986@att.com

A. Available numbers: 554,885

B. Assigned numbers: 644,754

C. Total Numbering Resources: 1,309,976

D. Quantity of numbers activated in the past 90 days and excluded from the Utilization calculation: 0
List excluded Code(s) or Block(s):

	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12
	<u>-559</u>	<u>-854</u>	<u>-1272</u>	<u>-900</u>	<u>-1069</u>	<u>-1230</u>						
E. Growth History – Previous 6 months ²	<u>0</u>	<u>412</u>	<u>824</u>	<u>857</u>	<u>660</u>	<u>891</u>	<u>860</u>	<u>271</u>	<u>-181</u>	<u>-467</u>	<u>-533</u>	<u>-652</u>
F. Forecast – Next 12 months ³												
G. Average Monthly Forecast (Sum of months #1-6 (Part F above) divided by 6):	<u>607.333</u>											
H. Months to Exhaust ⁴	$\frac{\text{Numbers Available for Assignment to Customers (A)}}{\text{Average Monthly Forecast (G)}}$						=	<u>913.64</u>				
I. Utilization ⁵	$\frac{\text{Assigned Numbers (B)}}{\text{Total Numbering Resources (C) – Excluded Numbers (D)}}$						* 100	=	<u>49.22%</u>			

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))

From: margaret.harrell-simington@neustar.biz
Sent: Friday, January 26, 2018 10:33 AM
To: BERRIS, PATTY; CODE ADMIN SBC INTERNET SVCS
Cc: PA_Part3@neustar.biz
Subject: , 816-KANSASCITY-MO-1073327 - DENIED PAS - Part 3 Confirmation

Pooling Administration System
Dated 26 January 2018

Thousands-Block Number Pooling Administration Guidelines
(TBPAG) - Part 3

Revised: January 4, 2016
Pooling Administrator's Response/Confirmation

Tracking Number : 816-KANSASCITY-MO-1073327

Date of Application: 01/26/2018
Effective Date:

Date of Receipt: 01/26/2018
Date of Response:
01/26/2018

Service Provider Name: SOUTHWESTERN BELL
(LERGTM Routing Guide1) OCN: 9533
Parent Company OCN: 9533

NPAC SOA SPID :

Pooling Administrator Contact Information:
Margaret Harrell-Simington Phone: 925-363-8747
Signature of Pooling Administrator
Margaret Harrell-Simington Fax: 925-363-8747
Name (print)

Email: margaret.harrell-simington@neustar.biz

NPA-NXX or NPA-NXX-X :
Block Reserved :
Block Reservation Expiration Date :
Block/Code Modified :
Block/Code Disconnected :

Block Assigned:

Block Contaminated (Yes or No):

If yes, enter the number of TNs contaminated (1-1000):

Switch Identification (Switching/POI)²: KSCYMO55DS3

Rate Center: KANSASCITY

X Form complete, request denied.

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new code is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

Request Withdrawn.

Explanation:

Assignment Activity Suspended by Administrator.

Explanation:

Remarks:

¹ Telcordia® is a registered trademark and LERGTM Routing Guide and iconectivTM are trademarks and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

² This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the Common Language® Location Code (CLLITM Code) of the switching entity/POI shown on the Part 1A form. Common Language® is a registered trademark and CLLI is a trademark and the Intellectual Property of Telcordia Technologies, Inc. dba iconectiv.

<http://web.neustar.biz/html_emails/images/barcelona_10_ns_logo2.gif>

This Exhibit is Confidential, in its entirety, under 4 CSR 240-2.135(2)(A)(3)