

May 4, 2022

VIA ELECTRONIC SUBMISSION

Morris L. Woodruff
Secretary
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, MO 65102-0360

Dear Ms. Woodruff:

Pursuant to 20 CSR 4240-2.135, Allbridge LLC (“Allbridge”), by its attorney, respectfully requests that certain information in Allbridge’s Annual Report to the Missouri Public Service Commission for calendar year 2021 (“Annual Report”) receive a confidential designation and receive non-public treatment under seal. Specifically, Allbridge requests that the Commission designate as confidential Allbridge’s revenue information and interconnected VoIP (“IVoIP”) line quantities, located on pages 3 and 4 of Allbridge’s Annual Report, respectively.

This confidential information, which has been redacted from the publicly available version of Allbridge’s Annual Report, constitutes confidential information under 20 CSR 4240-2.135(2)(A)(1) and (A)(8). These sections of the Missouri Code of Regulations protect from public disclosure customer-specific information and a company’s trade secrets, which is defined as including data that “derives independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use” and which “is the subject of efforts that are reasonable under the circumstances to maintain its secrecy.” V.A.M.S. 417.453(4).

Allbridge uses its revenue information and IVoIP line quantities to not only monitor its own financial well-being, but also to refine and develop its ongoing and future business strategies in Missouri. Allbridge is not a publicly-traded company and maintains information regarding its financials and IVoIP line quantities as strictly confidential and not available for public disclosure. Moreover, Allbridge, as an IVoIP provider, must compete with other local telephone companies for business in Missouri, and if other carriers were to have access to Allbridge’s current financials and IVoIP line quantities it could negatively affect Allbridge’s competitive position. There is also a risk that disclosure of Allbridge’s IVoIP line quantities would provide Allbridge’s competitors with enough information to deduce Allbridge’s customers, potentially resulting in the release of sensitive customer-specific information. Given the above facts, which are supported by sworn

declaration,¹ it is clear that Allbridge's revenue information and IVoIP line quantities should be afforded confidential designation under 20 CSR 4240-2.135(A)(1) and (A)(8).

In accordance with the Commission's Annual Report Instructions, Allbridge designates the following for answering any questions regarding this request or the confidential information submitted:

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'P. Hudson', written in a cursive style.

Paul Hudson
Counsel for Allbridge LLC

¹ See Allbridge LLC Request for Confidential Treatment, Affidavit of Anthony Buglak, submitted to the Commission on April 15, 2021 in connection with Allbridge's 2020 Annual Report and incorporated as part of this request by reference.