

Memorandum

To: Case File, Case No. AX-2011-0094
From: Colleen M. Dale, Telecommunications Counsel
Date: June 10, 2013
Subject: Section 536.200.2 Compliance

Section 536.200.2, RSMo 2000 requires agencies to make a filing with the Secretary of State if, after the first full year after implementation, the cost of the rule exceeds the agency estimate. The Commission Staff has investigated the cost of implementing the rule adopted by the Commission in this case and reports no information has been discovered showing the cost estimate published in the Missouri Register was inaccurate. This rulemaking, effective October 30, 2011 and promulgating 4 CSR 240-2.062 in replacement of 4 CSR 240-2.060, set out simplified company name change procedures. The rulemaking projected the proposed rule would create a public fiscal impact of \$1531.33 per year. During this fiscal year, 7 name changes were filed electronically and no merger cases not involving name changes have been filed. All those filings were electronic. In addition to significantly fewer name changes in fiscal year 2013 than anticipated, and the fact that none of the telecommunications name changes were paper-filed, the fiscal impact of the rule was less than anticipated. Moreover, newer, streamlined internal procedures have lowered the public entity cost further. Since the published cost estimates related to the changes in the rule have not been exceeded, no *Missouri Register* publication is required under Section 536.200.2, RSMo 2000.