

## Memorandum

To: Case File  
Case No. TX-2010-0160

From: John Van Eschen  
Telecommunications Unit

Date: July 24, 2012

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 July 30, 2010, revised 4 CSR 240-33.160 whereby a company's annual customer proprietary network information (CPNI) filing would be included in a company's annual report rather than a separate filing. The rulemaking projected the proposed revision will not create a public or private fiscal impact. No fiscal impact will have been created since the rulemaking simply eased regulatory compliance. In addition, the Missouri Commission's CPNI requirements have been waived through subsequent passage of House Bill 338. 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.