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Missouri Public  
Service Commission

January 22, 2010

**Via Overnight Courier**

Mr. Steven C. Reed, Secretary  
Governor Office Building  
200 Madison Street  
Jefferson City, MO 65102

**RE: Order Directing Collection of Broadband Provider Information  
File No. AO-2010-0213  
Response of Global Crossing Telecommunications, Inc**

Dear Mr. Reed,

Global Crossing respectfully claims exemption from the broadband reporting requirements because Global Crossing is not a facilities-based Internet Service Provider like many incumbent telephone and cable companies and our services are not provisioned within a ten-day interval. Global Crossing Telecommunications, Inc. (GCTI) lacks local loop plant and instead provides broadband service via special access lines that are leased from the local service provider and which terminate at the end user location. GCTI provisions/equips these lines as broadband.

Broadband service from GCTI is "available" wherever special access lines are available for lease from the local service provider. GCTI does not have access to serviceable area data from the local service providers for these lines, but orders such service as requested by customers. If available from the local service provider, and the customer agrees to the charges, the service is provisioned. Otherwise, the service is not provisioned. Special access, which is an essential input into Global Crossing's broadband services, is rarely provisioned within a ten-day interval. Therefore, Global Crossing's broadband services are not provisioned within a ten-day interval.

Sincerely,

A handwritten signature in dark ink, appearing to read "Michael J. Shortley III".

Michael J. Shortley III  
Vice President & Regional General Counsel for North America