

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Southwestern Bell Telephone Company d/b/a AT&T)	
Missouri's Petition for Compulsory Arbitration of)	
Unresolved Issues for an Interconnection Agreement)	Case No. IO-2011-0057
With Global Crossing Local Services, Inc. and Global)	
Crossing Telemanagement, Inc.)	

GLOBAL CROSSING COMMENTS CONCERNING AGREEMENT

Global Crossing hereby provides pursuant to 4 CSR 240-36.050(2) these Comments regarding the standard of review to be applied in considering the conformed interconnection agreement ("ICA").

1. Under 4 CSR 240-36.050(2) the parties may provide comments concerning the ICA. However, those comments must be limited to the standards utilized by the Commission in its consideration of the ICA. More specifically, the comments may address only those topics set forth in 4 CSR 240-36.050(4).

2. On December 28, 2010, Global Crossing filed a Statement concerning the ICA, in which it argued that the ICA does not meet the requirements of Sections 251 and 252 of the Communications Act. In that failure to meet the requirements of Section 251 constitutes grounds for rejection of an interconnection agreement, and the standards of Section 251 must be applied in determining whether to approve or reject an interconnection, Global Crossing incorporates by reference the content of its December 28 Statement. As demonstrated in that pleading, the ICA does not meet the Section 251 standards and should therefore be rejected.

For the foregoing reasons, Global Crossing respectfully requests that the Commission consider these Comments in determining the appropriate standard for review of the ICA, and

find that the ICA does not comport with the standards of Section 251 of the Communications Act.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 10th day of January, 2011, served a true and final copy of the foregoing by electronic transmission upon the following, listed below, in accordance with Commission rules.

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