

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

In Re: The Paging Interconnection Agreement            )  
By and Between Metrocall, Inc. and Southwestern       )  
Bell Telephone, L.P., d/b/a AT&T Missouri                )  
Pursuant to Sections 251 and 252 of the                    )  
Telecommunications Act of 1996.                                )  
Case No. \_\_\_\_\_

**AT&T MISSOURI'S APPLICATION FOR APPROVAL OF  
A PAGING INTERCONNECTION AGREEMENT**

AT&T Missouri,<sup>1</sup> pursuant to Section 252(e) of the Telecommunications Act of 1996 (the "Act") and 4 CSR 240-3.513(1), respectfully submits its Application for Approval of a Paging Interconnection Agreement by and between AT&T Missouri and Metrocall, Inc. ("Metrocall") and requests the Missouri Public Service Commission ("Commission") approve this Agreement.

In support of this Application, AT&T Missouri states:

1. AT&T Missouri is a Texas limited partnership<sup>2</sup> duly authorized to conduct business in Missouri,<sup>3</sup> with its principal Missouri office at One AT&T Center, Room 3520, St. Louis, Missouri 63101. AT&T Missouri is authorized to do business in

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<sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri will be referred to in this pleading as "AT&T Missouri." It previously conducted business as "SBC Missouri."

<sup>2</sup> In accordance with 4 CSR 240-2.060(1)(G), a copy of the Southwestern Bell Telephone, L.P. partnership agreement was filed with the Commission on October 15, 2003. See, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, for Review and Reversal of North American Number Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2004-0170.

<sup>3</sup> In accordance with 4 CSR 240-2.060(1)(G), a copy of the certificate from the Missouri Secretary of State certifying that Southwestern Bell Telephone, L.P. is a foreign limited partnership duly authorized to transact business in the State of Missouri was filed with the Commission on January 7, 2002. See, In the Matter of the Application of Southwestern Bell Telephone Company to Transfer Property and Ownership of Stock Pursuant to Section 392.300, RSMo., Case No. TO-2002-185.

Missouri and its fictitious name is duly registered with the Missouri Secretary of State.<sup>4</sup> AT&T Missouri is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo. 2000.<sup>5</sup>

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Leo J. Bub  
Robert J. Gryzmala  
Attorneys for Southwestern Bell Telephone, L.P.,  
d/b/a AT&T Missouri  
One AT&T Center, Suite 3518  
St. Louis, Missouri 63101

3. AT&T Missouri does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of this Application.

4. AT&T Missouri does not have any annual report or assessment fees that are overdue.

5. AT&T Missouri seeks approval of this Paging Interconnection Agreement pursuant to Section 252(e)(1) of the Telecommunications Act of 1996 ("the Act"). The Commission must approve the Paging Interconnection Agreement unless it determines that the Paging Interconnection Agreement (or any portion thereof): (1) discriminates

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<sup>4</sup> In accordance with 4 CSR 240-2.060(1)(G), a copy of the registration of the fictitious name "AT&T Missouri" was filed with the Commission on December 2, 2005. See, In the Matter of the Application of Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri for Review and Reversal of the North American Number Plan Administrator's Decision to Withhold Numbering Resources, Case No. TO-2006-0247.

<sup>5</sup> By its Order Recognizing Name Change, Approving Tariff and Closing Case, in Case No. IN-2006-0232 (effective December 29, 2005), the Commission ordered that the fictitious name "AT&T Missouri" be recognized. Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri previously conducted business as Southwestern Bell Telephone, L.P., d/b/a SBC Missouri.

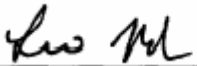
against a telecommunications carrier not a party to the agreement and/or amendment; or  
(2) the implementation of such agreement and/or amendment is not consistent with the  
public interest, convenience, and necessity.<sup>6</sup>

6. AT&T Missouri states that the Paging Interconnection Agreement does not  
discriminate against a telecommunications carrier not a party to the Paging  
Interconnection Agreement. AT&T Missouri further states that the implementation of the  
Paging Interconnection Agreement is consistent with the public interest, convenience, and  
necessity.

WHEREFORE, AT&T Missouri respectfully requests that the Commission  
approve the Paging Interconnection Agreement between AT&T Missouri and Metrocall,  
Inc.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.,  
D/B/A AT&T MISSOURI

BY 

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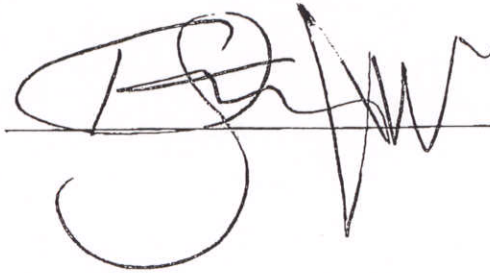
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<sup>6</sup> See Section 242(e)(2) of the Act.

COUNTY OF COLE            )  
                                  )       SS  
STATE OF MISSOURI        )

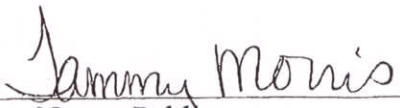
VERIFICATION

I, Tim Judge, first being duly sworn, state on my oath that I am over the age of twenty-one years, sound of mind, and Director-Regulatory of Southwestern Bell Telephone, L.P., d/b/a AT&T Missouri ("AT&T Missouri"). I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read the foregoing document and I am informed and believe that the matters contained therein are true.

A handwritten signature in dark ink, appearing to read 'Tim Judge', written over a horizontal line.

On this 1<sup>st</sup> day of February 2007, before me, a Notary Public, personally appeared Tim Judge, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and Director-Regulatory of AT&T Missouri, he signed the foregoing document as Director-Regulatory of AT&T Missouri and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.

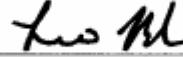
  
\_\_\_\_\_  
Notary Public

My Commission Expires: June 28, 2008

TAMMY R. MORRIS Notary Public - Notary Seal STATE OF MISSOURI Cole County My Commission Expires: June 28, 2008
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## **CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on February 1, 2007.



Leo J. Bub

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