# NEWMAN, COMLEY & RUTH

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March 24, 2005

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## VIA HAND DELIVERY

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

MAR 2 4 2005

**FILED**<sup>3</sup>

#### Missouri Public Service Commission

Re: Application for Transfer of Assets Matrix Telecom, Inc., Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc. and Global Crossing Telemanagement, Inc.

Dear Judge Roberts:

Please find enclosed for filing in the referenced matter the original and five copies of a Joint Application along with a Motion for Expedited Treatment.

Would you please bring this filing to the attention of the appropriate Commission personnel?

Should you have any questions regarding this filing, please let me know. Thank you.

Sincerely,

By:

NEWMAN, COMLEY & RUTH P.C.

spleen A. Martin

Cathleen A. Martin *martinc@ncrpc.com* 

CAM:ab Enclosure cc: Office of Public Counsel General Counsel's Office Judith A. Riley

ROBERT K. ANGSTEAD ROBERT J. BRUNDAGE MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH

#### BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF MISSOURI

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# **FILED**<sup>3</sup>

MAR 2 4 2005

Missouri Public Service Commission

Matrix Telecom, Inc. and	
Global Crossing Telecommu Global Crossing Local Servi Global Crossing Telemanage	ces, Inc. and
for Expedited Approval of the of Certain Assets and a Waive	

Applicable Anti-Slamming Regulations.

Joint Application of

Docket No. \_\_\_\_\_

## **MOTION FOR EXPEDITED TREATMENT**

COME NOW Matrix Telecom, Inc., (hereinafter referred to as "Matrix" or "Buyer") and Global Crossing Telecommunications, Inc., Global Crossing Local Services, Inc. and Global Crossing Telemanagement, Inc. (hereinafter referred to as "GC" or "Seller") (together the "Applicants"), by and through counsel, and for their Motion for Expedited Treatment pursuant to 4 CSR 240-2.060(17) hereby state:

1. On March 24, 2005, Buyer and Seller filed an application for authority to transfer assets (the "Application").

2. The transfer of assets, as described in the Application, is scheduled to occur as soon as the Commission approves the Transaction.

3. Applicants respectfully request the Commission to issue an Order approving the Application to be come effective as soon as possible. Specifically, Applicants request that the Commission approve the application with an order effective no later than May 15, 2005.

4. The proposed transaction is an important component of the Asset Purchase

Agreement entered into between Buyer and Seller on March 19, 2005. Accordingly, Applicants request that the Commission commence its review of this Application as soon as possible. It is in the interest of all parties – Matrix, GC, their customers, creditors and employees – that the reorganization process be completed quickly. Applicants have been mindful of the need to structure a transaction and proceed as quickly as possible to avoid any confusion or inconvenience to consumers. The public interest therefore supports commencement of the review process at this time.

WHEREFORE, for all the reasons stated herein, Applicants respectfully request that the Commission grant this Motion for Expedited Treatment and issue its order granting the relief requested in the Application with an effective date no later than May 15, 2005.

Respectfully submitted,

GLOBAL CROSSING TELECOMMUNICATIONS, INC., GLOBAL CROSSING LOCAL SERVICES, INC. AND GLOBAL CROSSING TELEMANAGEMENT, INC.

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MATRIX TELECOM, INC.

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Its Attorneys

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Their Attorneys

#### Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 24th day of March, 2005, to General Counsel's Office at gencounsel@psc.state.mo.us; Office of Public Counsel at opcservice@ded.state.mo.us.

athlen O. Martin