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MAY 22 2009

May 22, 2009

Missouri Public
Service Commission

Colleen Dale
Secretary, Missouri Public Commission
200 Madison Street
Jefferson City, MO 65101

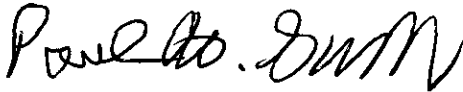
RE: In the matter of the Application of Intellectrace, Inc. for a certificate service authority to provide basic resold interexchange telecommunications services and to classify such services and the company as competitive.

Dear Ms. Dale:

Enclosed for filing please find an original and eight copies of the Application of Intellectrace, Inc. for a certificate of service authority to provide interexchange telecommunications services in the above referenced matter.

Please contact me if you need additional information concerning this application.

Sincerely,



Paul H. Gardner

PHG/cm

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

In the Matter of the Application of)
Inteltrace, for a Certificate of)
Service Authority to provide)
Interexchange Telecommunications)
Services in the State of Missouri) Case No.
and to classify such services and the)
Company as Competitive)

APPLICATION

Comes now INTELLETRACE, INC., ("Applicant"), by and through counsel, and hereby applies with the Missouri Public Service Commission ("Commission") for certificate of service authority to provide interexchange telecommunications services in the State of Missouri and to classify Applicant and its services as competitive. In support of its Application, Applicant states as follows:

1. Applicant is a foreign Corporation, duly organized and existing under the laws of the State of California, with its principal place of business located at 448 Ignacia Blvd., #222, Navato, California 94949. A copy of Applicant's certificate of authority issued by the Missouri Secretary of State to transact business in the State of Missouri is attached hereto as **Exhibit A.**
2. Correspondence and other communications concerning this application should be addressed to:

Paul H. Gardner
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Attorney for Novatel Ltd. Inc.
and
Judith A. Riley, Regulatory Counsel
5909 NW Expressway, Suite 101
Oklahoma City, OK 73132
Phone: (405) 755-8177 ext 24
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3. Applicant is a reseller of telecommunications services that proposes to provide interexchange telecommunications services within Missouri including T-1 or better, point-to-point private line and Internet access. Applicant requests authority to provide service to prospective business customers throughout the State of Missouri.
4. Applicant has the technical, managerial expertise and experience in the telecommunication industry to provide the services it proposes as set forth in the Management Biographies attached hereto as **Exhibit B**.
5. Pursuant to the requirements of 4 CSR 240-3.510 (1)(c), Applicant submits a proposed tariff for interexchange telecommunications services requesting a 45 day effective date attached hereto as **Exhibit C**.

The proposed tariff contains the rule and regulations applicable to the Applicant's customers, a description of services offered, and a list of rates associated with such services.

6. Applicant further requests classification as a competitive telecommunications company and that its services be classified as competitive within the State of Missouri. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation. Granting of this application is in the public interest as it will allow greater price and service options for telecommunications users.
7. Applicant also requests, pursuant to Section 392.420 RSMo 2000, that the Commission waive the application of the following statutes and commission rules as they relate to the regulation of Applicant:
- | | |
|----------------------------|--|
| 392.210.2 RSMo. | Establish Uniform Systems of Accounts for Annual Reports |
| 392.240(1) RSMo. | Setting Just and Reasonable Rates |
| 392.270 RSMo. | Ascertain property values |
| 392.280 RSMo. | Establish depreciation accounts |
| 392.290 RSMo. | Issuance of securities |
| 392.300.2 RSMo. | Acquisition of stock |
| 392.310 RSMo. | Issuance of stock and debt |
| 392.320 RSMo. | Stock dividend payment |
| 392.330 RSMo. | Issuance of securities, debts and notes |
| 392.340 RSMo. | Reorganization(s) |
| 4 CSR 240-10.020 RSMo. | Depreciation fund income |
| 4 CSR 240-30.040 RSMo. | Uniform System of Accounts |
| 4 CSR 240-3.550(5)(c)RSMo. | Telecommunication Company Records and Reports |

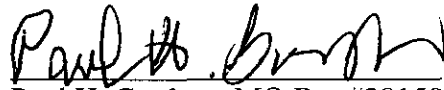
As these rules and statutory provisions are designed primarily to apply to non-competitive telecommunications companies, it would be inconsistent with Applicant's requested status as a competitive company to apply these rules and statutes to Applicant.

8. Pursuant to Section 386.570, RSMo 2000, Applicant will comply with all applicable Commission rules other than those specifically waived by the Commission pursuant to the waiver request filed by the Applicant.
9. Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court involving customer service or rates, which action, judgment or decision has occurred within three years of the date of this Application. No Commission annual reports or assessment fees are overdue.
10. Grant of this application will further the public interest by expanding the availability of competitive telecommunications services in the State of Missouri. In addition, intrastate offering of these services in Missouri is in the public interest because the services will provide Missouri customers with access to new technologies and service choices, and permit customers to achieve increased efficiencies and cost savings. In particular, the public will benefit through the use of the competitive services offered by Applicant and because the presence of Applicant in this market will increase the incentives for other telecommunications providers within Missouri to operate more efficiently, offer more innovative services, reduce prices, and improve the quality of services offered.

WHEREFORE, Applicant, Inteltrace, Inc., respectfully requests that the Missouri Public Service Commission grant Applicant certificate of service authority to provide interexchange telecommunications services within the State of Missouri, to

classify Intellectrace, Inc. as a competitive telecommunications company, and its services as competitive and to grant a waiver of the above specified rules and statutory provisions.

Respectfully submitted,



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ATTORNEY FOR INTELLETRACE, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was mailed this 21st day of May, 2009 via U.S. Mail to the Office of Public Counsel at 200 Madison Street, Suite 650, P.O. Box 2230, Jefferson City, Missouri 65102.

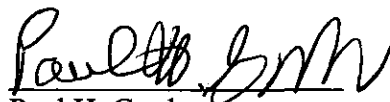


Paul H. Gardner

ATTORNEY VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF JACKSON)

I, Paul H. Gardner, being duly sworn, do hereby certify, depose and state that I am the Attorney for Inteltrace, Inc., applicant in this proceeding; that I have read the above and foregoing Application and that the allegations therein contained are true and correct to the best of my knowledge, information and belief; and that I am authorized to verify the foregoing application by the above said applicant.


Paul H. Gardner

Subscribed and sworn to before me, a Notary Public, this 21st day of May, 2009.

Cathy Mann - Notary Public
Notary Seal for State of
Missouri - Jackson County
My Commission Expires 11-30-11
Commission #07384166


Notary Public

LIST OF EXHIBITS

EXHIBIT A	Authority issued by Missouri Secretary of State
EXHIBIT B	Management Biographies
EXHIBIT C	Proposed Interexchange Tariff