BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)
Intrado Communications Inc.	
For Certificate of Service Authority to) File No. CA-2011-0360
Provide Basic Local Telecommunications) Tariff Tracking No. YC-2011-0555
Services in the State of Missouri and to)
Classify Said Services and the)
Company as Competitive.)

APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE BASIC LOCAL EXCHANGE TELECOMMUNICATIONS SERVICES AND FOR COMPETITIVE CLASSIFICATION

Comes now Intrado Communications Inc., ("Applicant" or "Intrado"), by its undersigned counsel, and pursuant to Sections 392.245.5(8), 392.361, 392.410, 392.420, and 392.430, 392.450 and 392.455, RSMo, and 4 CSR 240-2.060 and 4 CSR 240-3.510, hereby applies for a certificate of service authority to provide basic local exchange telecommunications services throughout the State of Missouri and to classify said services and Applicant as competitive. Pursuant to Sections 392.420, 392.245.5(8) and 392.361, RSMo and 4 CSR 240-32.010(2), Intrado also seeks a waiver of certain Commission rules and statutory provisions. In support of its Application, Intrado states as follows:

- 1. Intrado Communications Inc. is a corporation duly organized and existing under and by virtue of the laws of the State of Delaware and is duly authorized to conduct business in Missouri. The nature of the Applicant's business is telecommunications. Applicant's principal place of business is 1601 Dry Creek Drive, Longmont, CO 80503. Its telephone number is 720-494-5800 and its toll-free customer service number is 877-318-7941.
- 2. Intrado was previously granted a certificate of service authority from the Missouri Public Service Commission to provide intrastate interexchange and non-

switched local exchange telecommunications service in Case No. TA-2002-154 (Order issued December 11, 2001, effective December 21, 2001). Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Authority to transact business in Missouri, issued by the Missouri Secretary of State, was attached to the Application in that case, and is hereby incorporated by reference herein, pursuant to 4 CSR 240-2.060(1)(G). Intrado Communications Inc. remains in "Good Standing" status with the Missouri Secretary of State's Office.

- 3. The certificate of service authority granted in Case No. TA-2002-154 granted Intrado authority to provide interexchange and non-switched local exchange services, limited to dedicated private line services, statewide, and granted Intrado the status of a competitive telecommunications company.
- 4. An officer's verification of the information contained in this Application is attached hereto.
- 5. All correspondence, communications, pleadings, notices, orders and decisions relating to the case should be addressed to:

William D. Steinmeier William D. Steinmeier, P.C. 2031 Tower Drive (ZP 65109) P.O. Box 104595 Jefferson City, Missouri (MO) 65110-4595 573-659-8672 Tel. 573-636-2305 Fax wds@wdspc.com

With a copy to:

Sharon Thomas
Consultant to Intrado Communications Inc.
Technologies Management, Inc.
2600 Maitland Center Parkway, Suite 300
Maitland, Florida (FL) 32751
407-740-3031 Tel.
407-740-0613 Fax
sthomas@tminc.com

All inquiries or communications concerning the ongoing operations of the

Applicant should be directed to:

Richard Johnson
Manager – Regulatory Affairs
Intrado Communications Inc.
1601 Dry Creek Drive
Longmont, Colorado (CO) 80503
720-494-5800 Tel.
720-494-6600 Fax
regulatory@intrado.com

- 6. By this Application, Intrado requests a certificate of service authority to provide competitive basic local exchange services to customers throughout all exchanges in the state of Missouri of all incumbent local exchange companies (ILECs). The exchanges in which Intrado seeks authority are listed in the approved tariffs of the ILECs, and will be listed in Applicant's tariff. Intrado's proposed service areas will follow the respective exchange boundaries of each incumbent LEC and shall be no smaller than an exchange as required by Section 392.455(3) RSMo.
- 7. Pursuant to this Application, Intrado seeks to offer and provide basic local exchange telecommunications services, including E9-1-1 emergency services to government and quasi-government Public Service Answering Points ("PSAPs").

- 8. Intrado possesses sufficient technical and managerial resources and abilities to provide local telecommunications service as required by Section 392.455(1), RSMo. A listing of Applicant's current principal management employees and their qualifications, which demonstrate the Applicant's extensive experience and expertise, is attached as **Exhibit A**.
- 9. Intrado also possesses the necessary financial resources and abilities to provide the services it proposes as required by Section 392.455(1), RSMo and has the necessary capital to conduct its proposed operations in Missouri, as found in Case No. TA-2002-154. Based on the prior determination, Intrado seeks a waiver of the requirement that historic and pro forma financial data be submitted under 4 CSR 240-3.510(1)(D). However, Intrado submits an officer's affidavit concerning its technical, financial and managerial resources and abilities as **Exhibit B.**
- 10. Applicant seeks continued classification as a competitive company, including classification of its basic local exchange telecommunications services as competitive, pursuant to Section 392.361 and Section 392.420, RSMo and 4 CSR 240-3.510(1)(A), with the accompanying reduced regulation that accompanies such classification. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation and that granting this request will allow greater price and service options for telephone users.
- 11. Applicant will offer basic local telecommunications service as a separate and distinct service in accordance with applicable law. Intrado will give consideration to equitable access for all Missourians, regardless of where they might reside or their

income, to affordable telecommunications services in Applicant's proposed service areas in accordance with applicable law.

12. Applicant is willing to comply with all applicable Commission rules, except those that are waived, in providing basic local service. Specifically, Intrado will maintain tariffs that meet applicable minimum standards established by the Commission. Intrado will make reports to and other informational filings with the Commission as required. Pursuant to Section 392.420, RSMo and Section 392.245.5(8), which provide good cause for this request, Applicant requests the following statutes and regulations be waived for Intrado Communications Inc. and its basic exchange service offerings:

STATUTES

392.210.2	Uniform System of Accounts
392.240.1	Rates-rentals-service & connections
392.270	Valuation of property (ratemaking)
392.280	Depreciation accounts
392.290	Issuance of securities
392.300	Transfer of assets and acquisition of stock
392.310	Issuance of securities
392.320	Stock dividend payment
392.330	Issuance of securities, debt and notes
392.340	Reorganization(s)

REGULATIONS

4 CSR 240-3.550(4)	Held order records
4 CSR 240-3.550(5)(A)	Quality of service reports
4 CSR 240-10.020	Depreciation fund income
4 CSR 240-30.040	Uniform System of Accounts
4 CSR 240-32.060	Engineering and maintenance
4 CSR 240-32.070	Quality of service
4 CSR 240-32.080	Service objectives and surveillance levels
4 CSR 240-33.040	Billing and payment standards
(1) through (3) and	
(5) through (10)	
4 CSR 240-33.045	Appearance of charges on bills

4 CSR 240-33.080(1)

Company name and number on bills

4 CSR 240-33.130(1),

Operator service requirements

(4) and (5)

4CSR 240-32-050(4)(B)

Limited White Pages waiver

13. Applicant acknowledges 4 CSR 240-3.510(1)(C), which requires that a tariff and any applicable interconnection agreements must be filed with the Commission and approved before service can be provided. A proposed tariff is being filed

contemporaneously with this Application, bearing a 45-day effective date.

14. Applicant submits that the public interest will be served by Commission

approval of this application because Applicant's proposed services will create and

enhance competition and expand customer service options consistent with the

legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter

392 RSMo. Prompt approval of this application also will expand the availability of

innovative, high quality, and reliable telecommunications services within the State of

Missouri.

15. Notwithstanding the provisions of Section 392.500 RSMo., as a condition

of certification and competitive classification, Intrado Communications Inc. agrees that,

unless otherwise ordered by the Commission, Applicant's originating and terminating

switched exchange access rates will be no greater than the lowest Commission-

approved corresponding access rates in effect for each ILEC within those service

area(s) in which Applicant seeks authority to provide service. Additionally, pursuant to

the Commission's Report and Order in Case No. TO-99-596, Applicant agrees that if the

ILEC in whose service area Intrado Communications Inc. is operating decreases its

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Missouri Application of Intrado Communications Inc.

originating and/or terminating access service rates, Applicant shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates within thirty (30) days of the ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap on switched exchange access rates.

- 16. Intrado has no pending or final judgments or decisions against it from any state or federal agency or court that involves customer rates or service.
 - 17. Intrado has no annual report or assessment fees that are overdue.
- 18. Applicant acknowledges that 4 CSR 240-4.020 (2) requires any regulated entity to give 60-days' notice prior to filing any case "likely to be a contested case." 4 CSR 240-4.020 (2) (B) provides that a party may request a waiver of that section for good cause. Applicant hereby requests a waiver of the 60-day notice requirement because: (1) this application is unlikely to result in a hearing; (2) the typical noncontested nature of this type of application provides good cause for waiving the requirement; and (3) no communication has occurred with the Commission within the scope of 4 CSR 240-4 prior to the filing of this Application.

WHEREFORE, Applicant Intrado Communications Inc. respectfully requests that

the Commission: (1) grant it a certificate of service authority to provide basic local

telecommunications services as herein requested; (2) classify Applicant and its

proposed services as competitive; (3) grant the requested waivers of statutes and

regulations; (4) approve its separately filed tariff; and (5) grant a waiver of 4 CSR 240-

4.020(2) if deemed applicable.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier

MoBar #25689

WILLIAM D. STEINMEIER, P.C

2031 Tower Drive

P.O. Box 104595

Jefferson City MO 65110-4595

Telephone: 573-659-8672

Facsimile: 573-636-2305 Email: wds@wdspc.com

ATTORNEY FOR APPLICANT

Intrado Communications Inc.

Dated: May 2, 2011

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov and on the General Counsel's office at gencounsel@psc.mo.gov this 2nd day of May 2011.

/s/ William D. Steinmeier			
	William D. Steinmeier		

State of Colorado)	
)	
)	SS.
)	
County of Boulder)	

VERIFICATION

Craig W. Donaldson, being first duly sworn, deposes and says: That he is the Senior Vice President Regulatory Affairs for Intrado Communications Inc., the Applicant in the foregoing Application for a Certificate of Authority to provide facilities-based and resold competitive local exchange services in the State of Arkansas; that he has read the Application; knows the contents thereof and is authorized to verify the accuracy of same; that the statements contained in the Application are true and correct to the best of his knowledge, information and belief.

Craig W. Donaldson

Senior Vice President Regulatory Affairs

Intrado Communications Inc.

Subscribed and sworn before me this 27th day of Account, 2011.

Notary Public

My Commission Expires: 10-14-14

Notary Seal:

RICHARD B. JOHNSON NOTARY PUBLIC STATE OF COLORADO

MY COMMISSION EXPIRES 10/14/2014

Intrado Communications Inc.

EXHIBIT A

Biographies of Key Personnel and Technical Abilities

Intrado Communications Inc. Biographies of Key Personnel

George Heinrichs, President

George Heinrichs is Co-founder and President of Intrado. A recognized emergency services expert, Mr. Heinrichs has played a key role in the evolution of the nation's 9-1-1 network and continues to influence 9-1-1 public policy. For his sustained support and leadership as well as his contributions to public safety and communications, Mr. Heinrichs has received numerous awards, including the National Emergency Number Association (NENA) William H. Stanton National 9-1-1 Service Award, the NENA President's Award and the Denver Telecom Professional Executive of the Year. In 2005, Mr. Heinrichs received the Ernst & Young Entrepreneur of the Year Award for Technology.

Stephen Meer, Chief Technology Officer

Stephen Meer is the Co-founder and Chief Technology Officer of Intrado. He is also actively involved with the development of 9-1-1 public policy and is a valued advisor to government and industry organizations such as the FCC, the National Emergency Number Association (NENA), and the U.S. Department of Transportation. Mr. Meer is a charter-certified Emergency Number Professional (ENP), RCA Fellow, and an active member of NENA, APCO International, the Institute of Electrical and Electronics Engineers (EEE) and the National Sheriff's Association. In 2005, Mr. Meer received the Ernst & Young Entrepreneur of the Year Award for Technology.

Craig W. Donaldson, Senior Vice President, Regulatory Affairs

Craig W. Donaldson is the Senior Vice President of Regulatory Affairs for Intrado and is responsible for the development of the Company's telecommunications-related policies that are advocated in state and federal forums.

Mr. Donaldson joined Intrado in 1997 and served as Intrado's General Counsel until the Company was acquired by West Corporation in April 2006. Before joining Intrado, Mr. Donaldson practiced law for nine years with an emphasis on trials and appeals and represented clients primarily in the media and telecommunications industries. Prior to that he worked at AT&T for six years and served for one year on the Colorado Commission on Government Productivity under former Governor Roy Romer. Mr. Donaldson is a member of the Federal Communications Commission's Communications Security, Reliability and Interoperability Council, and serves on the Advisory Board for the University of Colorado's Silicon Flatirons Telecommunications Program and on the Board of directors of ATIS (Alliance for Telecommunications Industry Solutions).

Intrado Communications Inc. Senior Executive Team Biographies (Continued)

Mary Hester, Executive Vice President

Mary Hester is the Senior Vice President of sales and service delivery for Intrado. In this role she leads Intrado teams responsible for sales and delivery of Intrado products and services to telecommunications carriers and public safety agencies in North America. She also oversees strategic planning, operations and customer satisfaction and is directly responsible for the provision of 9-1-1 services to carriers serving over 350 million subscribers.

Prior to assuming her current assignment, Ms. Hester was senior vice president of Intrado's Wireline Business. In this role she expanded and strengthened Intrado's relationships with Incumbent Local Exchange Carriers, VoIP carriers and direct customers.

Before that, she was vice president of wireless operations for Intrado. Ms. Hester joined Intrado in 1997 as manager of Intrado's Data Integrity Unit, where she made a significant contribution to improving 9-1-1 data quality.

Ms. Hester has an extensive public safety background that began with a 15-year career with the Boulder Regional Communications Center. Ms. Hester is a member of the National Emergency Number Association, and has received numerous civic awards for her dedication to public safety.

Sue Sipperley, Senior Director Financial Planning & Analysis

Sue Sipperley is the Senior Director of Financial Planning & Analysis for Intrado Communications Inc. and is responsible for the company's budgeting, forecasting and strategic financial planning. Ms. Sipperley is a Certified Public Accountant and has worked for Intrado for over 8 years. Prior to joining Intrado she was the CFO for GlobalCrossing Conferencing Division, and held a variety of financial management positions for GlobalCrossing over the course of 13 years. Prior to joining GlobalCrossing she was a senior auditor for KPMG, one of the big four audit firms. Sue graduated with honors with a BBA from Western Michigan University. Sue leads a finance team of nine individuals supporting all finance efforts for Intrado Communications Inc.

Michael Nelson, Senior Technical Officer

As Senior Technical Officer, Mr. Nelson provides guidance for solution architecture, products, customer sales, and deployments. Mr. Nelson is active in various industry organizations including the National Emergency Number Association and American National Standards efforts with the Alliance for Telecommunications Industry Solutions (ATIS).

Previously, Mr. Nelson was Intrado's Vice President of Software Engineering. In that role, he was responsible for architecture, engineering, and development of Intrado's service offerings and software products. He has more than 26 years of experience in software development as well as extensive telecommunications and information technology experience in product development involving call processing, large databases, GIS functionality, client server system architecture, and monitoring and alarming systems. Mr. Nelson holds six patents related to emergency call services.

Prior to joining Intrado, Mr. Nelson held senior positions in software development at Qwest and U S West, including senior director of network systems, where he managed software development organizations related to telephony network design and operations. Mr. Nelson was a member of the technical staff at AT&T Bell Laboratories after earning a Master of Science degree in computer science from the University of Southern California and a bachelor's degree in computer science from Northern Arizona University. Mr. Nelson has been an active participant in American National Standards development bodies and was a member of the Federal Communications Commission (FCC) Network Reliability & Interoperability (NRIC) study of next generation 9-1-1 services.

Intrado Communications Inc.

EXHIBIT B

Officer's Affidavit Concerning Intrado Communications Inc.

Technical, Financial and Managerial Resources and Abilities

State of Colorado)	
)	
)	SS.
)	
County of Boulder)	

AFFIDAVIT

Craig Donaldson, known to the undersigned Notary to be a credible person and of lawful age, who being first duly sworn on his oath, deposes and says:

- I am Senior Vice President Regulatory Affairs of Intrado Communications Inc., the Applicant in this matter, and am authorized to make this Affidavit on behalf of Intrado Communications Inc.
- This Affidavit is submitted in support of Intrado Communications Inc.'s Application for a
 Certificate of Authority to provide facilities-based and resold competitive local exchange services in the
 State of Arkansas.
- 3. In my capacity as Senior Vice President Regulatory Affairs, I have executive responsibilities for the day to day financial matters associated with Intrado Communications Inc.
- 4. Intrado Communications Inc. possesses sufficient technical, financial and managerial resources and abilities to provide basic telecommunications services in Missouri.
- 5. Intrado Communications Inc. has not defaulted on any of its financial obligations within the last three years.

Craig Donaldson

Senior Vice President Regulatory Affairs Intrado Communications Inc.

Subscribed and sworn before me this 27th day of April , 2011

Further Affiant sayeth not.

Notary Public

My Commission Expires: 10 - 14 - 14

Notary Seal:

RICHARD B. JOHNSON NOTARY PUBLIC STATE OF COLORADO MY COMMISSION EXPIRES 10/14/2014