

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Service Comm	ublic
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Application of	ĺ		
Teleglobe USA LLC)		
d/b/a Teleglobe USA LLC (Missouri))		
)	Case No.	
for a Certificate of Service Authority to Provide)		
Competitive Intrastate Interexchange)		
Telecommunications Services within the)		
State of Missouri)		

MOTION FOR EXPEDITED TREATMENT

COMES NOW Teleglobe USA LLC d/b/a Teleglobe USA LLC (Missouri) ("New Teleglobe" or "Applicant"), by and through counsel, and for its Motion for Expedited Treatment pursuant to 4 CSR 240-2.060(17) hereby states:

- 1. On February 25, 2003, Applicant filed an application seeking a certificate of service authority to provide resold intrastate interexchange telecommunications services and non-switched local exchange services in the state of Missouri and for competitive classification (the "Application"). The filing of this Application is one step in a comprehensive transaction arising out of Teleglobe USA Inc. ("Old Teleglobe") bankrupt status. Also on February 25, 2003 Old Teleglobe and New Teleglobe filed an application for authority to transfer assets (the "Joint Transfer Application").
- 2. The transfer of assets, as described in the Joint Transfer Application, is scheduled to occur as soon as the Commission approves the Transaction.

- 3. Applicant respectfully requests the Commission to issue an Order approving the Application to be come effective as soon as possible. Specifically, Applicant requests that the Commission approve the Application with an order effective no later than Friday, March 28, 2003.
- 4. The proposed transaction is an important component of the Teleglobe Reorganization and securing the necessary regulatory authorities in a timely manner is key to stabilizing the assets to be sold. Accordingly, Applicant requests that the Commission commence its review of this Application as soon as possible. Given the magnitude of Teleglobe's bankruptcy and its far-reaching effects, it is in the interest of all parties Teleglobe, Old Teleglobe, their customers, creditors, employees, and TLGB that the reorganization process be completed quickly. The Parties have been mindful of the need to structure a transaction and proceed as quickly as possible to avoid any confusion or inconvenience to consumers, and hope to have the transaction finalized so that New Teleglobe can commence business in the second quarter of this calendar year. The public interest therefore supports commencement of the review process at this time.
- 5. This transaction affects Teleglobe's operations in fifty states, the District of Columbia, Puerto Rico and before the Federal Communications Commission, and the process of researching the regulatory requirements, evaluating the need for approvals, preparing necessary documents customized for each state, and obtaining appropriate review by both parties was a substantial and time-consuming process. Old Teleglobe and New Teleglobe also filed extensive applications with the Federal Communications Commission. The Application was filed as expeditiously as possible to provide the Commission as much time as practicable to consider the transaction.

6. This Motion has been filed on the same day as the application to which it refers and has been filed as soon as it could have been.

WHEREFORE, for all the reasons stated herein, Applicant respectfully requests that the Commission grant this Motion for Expedited Treatment and issue its order approving Applicant's request for certificate of service authority as set forth in the Application with an effective date no later than March 28, 2003.

Respectfully submitted,

By:

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COUNSEL FOR APPLICANT

Dated: February 25, 2003

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid to the Office of Public Counsel and the General Counsel's office on this 25th day of February, 2003.

Mark W. Comley