

**ORIGINAL**

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

**APR 23 2002**

**Missouri Public  
Service Commission**

In the Matter of the Joint Application of )  
Enhanced Communications Network, Inc. )  
and Single Billing Services, Inc. d/b/a )  
Asian American Association for Approval )  
of Transfer of Assets, for Cancellation )  
of Certificate and Tariff, and for Waiver of )  
4 CSR 240-33.150. )

Case No. *XM-2002-1046-10*

**MOTION FOR EXPEDITED TREATMENT**

COME NOW, Enhanced Communications Network, Inc. ("ECN"), and Single Billing Services, Inc. d/b/a Asian American Association ("SBS") (collectively "Joint Applicants"), by and through counsel and pursuant to 4 CSR 240-2.080(17), and for their Motion For Expedited Treatment respectfully state as follows:

1. Joint Applicants this date have filed in this case a Joint Application seeking Commission approval of an asset transfer between the Joint Applicants.
2. The Joint Applicants, through national counsel, first filed for Commission approval of this asset transfer on October 11, 2001 in Case Number TM-2002-180 but that application was rejected due to certain filing requirements peculiar to Missouri and the case was dismissed on February 5, 2002.
3. As a result, Missouri regulatory approval has been delayed along with the closing on the asset transfer nationally.
4. National counsel for the Joint Applicants subsequently enlisted the assistance of Missouri counsel to revise and re-file their Joint Application. Therefore, pursuant to 4 CSR 240-2.080(17)(C), Joint Applicants state that they could not have filed this Application any sooner than this date.

5. Both ECN and SBS and the services they offer have been classified as competitive by the Commission, and accordingly, are subject to less regulatory oversight than traditional utilities. As such, review of the Joint Application itself should not require an extensive time or resource commitment by the Staff, Office of the Public Counsel, or by the Commission. Pursuant to 4 CSR 240-280(17)(B), the benefit of the Commission granting this Motion for Expedited Treatment is that the Joint Applicants' asset transfer can close nationally without further delay, thereby avoiding economic harm to the Joint Applicants and allowing for the orderly transition of business operations from SBS to ECN. As indicated in the Joint Application, the customers of SBS will continue to receive the same services at the same rates should the asset transfer be approved so there is no harm to customers or the general public should the Commission act expeditiously.

6. Pursuant to 4 CSR 240-280(17)(A), the Joint Applicants respectfully request that the Commission act on the Joint Application within 60 days, i.e. on or before June 24, 2002, if not sooner.

WHEREFORE, for all the reasons stated above-stated, Joint Applicants Enhanced Communications Network, Inc. and Single Billing Services, Inc. d/b/a Asian American Association respectfully request that the Commission grant this Motion For Expedited Treatment and issue its order approving the Joint Application in this case on or before June 18, 2002.

Respectfully Submitted,



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ATTORNEY FOR JOINT APPLICANTS

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Verified Application has been sent this date to the General Counsel's Office and the Office of the Public Counsel by hand-delivery, this 23<sup>th</sup> day of April, 2002

