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August 17, 2000

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Chicago Kansas City Los Angeles New York San Francisco St. Louis Washington, D.C.

# VIA FEDERAL EXPRESS

Mr. Dale Roberts **Executive Secretary** Missouri Public Service Commission 301 West High Street, Suite 530 Jefferson City, Missouri 65101

AUG 1 7 2000

#### Missouri Public Service Commission

Re: In the Matter of the Application of ConnectSouth Communications of Missouri, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service, Local Exchange Telecommunications Service, and Interexchange Telecommunications Service in the State of Missouri and to Classify Said Services and the Company as Competitive Case No.: TA-2000-585

Dear Mr. Roberts:

Enclosed for filing with the Commission is the Motion for Expedited Treatment for Commission's Consideration of Application of ConnectSouth Communications of Missouri, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service, Local Exchange Telecommunications Service, and Interexchange Telecommunications Service in the State of Missouri and to Classify Said Services and the Company as Competitive. The original and 14 copies of this document will be forwarded by Federal Express for delivery on August 18, 2000.

Thank you for bringing this matter to the attention of the Commission. If you should have any questions, please do not hesitate to contact me.

Very truly yours,

Lisa C. Creighton Comu

LCC:cmw Enclosures

cc: Michael Dandino, Office of Public Counsel William K. Haas, Office of General Counsel Mimi B. MacDonald, Southwestern Bell Telephone Company

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

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AUG 1 7 2000 Missouri Public Service Commission

In the Matter of the Application of ConnectSouth Communications of Missouri, Inc. for a Certificate of Service Authority to Provide Basic Local Telecommunications Service, Local Exchange Telecommunications Service, and Interexchange Telecommunications Service in the State of Missouri and to Classify Said Services and the Company as Competitive

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Case No. TA-2000-585

# MOTION FOR EXPEDITED TREATMENT FOR COMMISSION'S CONSIDERATION OF APPLICATION OF CONNECTSOUTH COMMUNICATIONS OF MISSOURI, INC., FOR A CERTIFICATE OF SERVICE AUTHORITY TO PROVIDE BASIC LOCAL TELECOMMUNICATIONS SERVICE, LOCAL EXCHANGE TELECOMMUNICATIONS SERVICE, AND INTEREXCHANGE TELECOMMUNICATIONS SERVICE IN THE STATE OF MISSOURI AND TO CLASSIFY SAID SERVICES AND THE COMPANY AS COMPETITIVE

COMES NOW ConnectSouth Communications of Missouri, Inc. ("ConnectSouth"), by its undersigned counsel, and in support of this Motion to Expedite Commission's Consideration in this docket, states as follows:

## **INTRODUCTION**

1. In this Motion, ConnectSouth requests that its application for a certificate of authority and the approval of the accompanying tariff be placed on the Commission's Agenda for August 31, 2000. Further, ConnectSouth requests that the effective date for the Commission's Order be reduced from ten (10) days to four (4) days. ConnectSouth makes this request to facilitate its immediate entry into the telecommunications market. ConnectSouth is prepared today (and hopes to begin on September 4, 2000) to offer such services. Each day this Commission does not act is one less day for competitive benefits to be delivered to the Missouri

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consumer. Further, ConnectSouth is unaware of any potential negative impact on ConnectSouth's customers or the general public

2. This motion is being filed in an effort to expedite consideration of its application for a certificate and approval of its tariff now that all necessary papers have been filed. Therefore, it is being filed at the first opportunity.

## BACKGROUND

3. On March 21, 2000, ConnectSouth filed its Application for a certificate to provide basic local telecommunications service, local exchange telecommunications service, and interexchange telecommunications service.

4. On March 28, 2000, this Commission issued an Order giving other providers notice of ConnectSouth's Application.

5. On April 7, 2000, Southwestern Bell Telephone Company ("SWBT") filed a motion to intervene in this docket.

6. On July 7, 2000, ConnectSouth filed its proposed tariff, MO PSC No. 1, under which it will offer interexchange and local exchange services. Since then, ConnectSouth has filed revised original pages. The effective date of the tariff is August 20, 2000.

7. On July 12, 2000, the parties filed an Unanimous Stipulation and Agreement addressing all issues outstanding in connection with issuance of the Certificate to offer all requested services.

8. On July 13, 2000, Staff filed its recommendations in support of the Unanimous Stipulation and Agreement granting all requested services to ConnectSouth.

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9. On August 10, 2000, Staff filed its recommendation for approval of ConnectSouth's MO PSC Tariff No. 1 under which ConnectSouth will offer interexchange telecommunications and local exchange telecommunications services.

10. On August 16, 2000, ConnectSouth's application for approval of its Interconnection Agreement with SWBT was filed. While this document was sent from the offices of Sonnenschein Nath & Rosenthal on August 7, 2000 via Federal Express for priority overnight delivery, Federal Express was unable to successfully deliver the filing to Jefferson City until August 16, 2000.

11. Simultaneously with the filing of the Motion to Expedite in this proceeding, ConnectSouth is filing a Motion to Expedite the approval of its Interconnection Agreement in Case No. TO-2001-95.

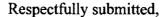
12. All parties except SWBT have agreed to either support or not to oppose ConnectSouth's request for a shorter effective period for the Commission's Order of four days.

13. In connection with this request, ConnectSouth agrees to extend the effective date of its tariff until September 4, 2000.

## **CONCLUSION**

Based on the above, ConnectSouth respectfully requests that its application for a certificate of authority to provide basic local exchange, local exchange services and interexchange telecommunications services and approval of its MO PSC No. 1 tariff be placed on the Commission's Agenda no later than August 31, 2000. Further, Connect South requests that both the certificate and the approval of the tariff be effective the same day, with a four-day effective period for the order instead of the normal 10 days.

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ATTORNEY FOR APPLICANT CONNECT SOUTH COMMUNICATIONS OF MISSOURI, INC.

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this  $ln^{\mu}$  day of  $ln_{\mu}$ , 2000, a true and correct copies of the above and foregoing was mailed, postage prepaid, to:

Michael Dandino Office of Public Counsel 301 West High Street Suite 250 Jefferson City, Missouri 65101

William K. Haas, Esq. Missouri Public Service Commission 301 West High Street Room 530 Jefferson City, Missouri 65101

Mimi B. MacDonald, Esq. Southwestern Bell Telephone Company One Bell Center, Room 3510 St. Louis, Missouri 63101

ATTORNEY FOR APPLICANT CONNECTSOUTH COMMUNICATIONS OF MISSOURI, INC.