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June 24, 2002

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: **TM-2002-**_____
Joint Application of ACSI Local Switched Services, Inc., American
Communication Services of Kansas City, Inc., Xspedius Management Co.
Switched Services, LLC, and Xspedius Management Co. of Kansas City,
LLC for Authority to Transfer Assets

Dear Mr. Roberts:

Enclosed for filing on behalf of ACSI Local Switched Services, Inc.,
American Communication Services of Kansas City, Inc., Xspedius Management
Co. Switched Services, LLC, and Xspedius Management Co. of Kansas City,
LLC please find an original and eight (8) copies of a **"MOTION FOR EXPEDITED
TREATMENT"** relating to the Joint Application for Authority to Transfer Assets
filed simultaneously herewith.


Please see that this filing is brought to the attention of the appropriate
Commission personnel.

Copies of this filing are being hand-delivered, or sent via postage-prepaid
U.S. mail, to the Office of Public Counsel and the Commission's General
Counsel's office.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By: 
William D. Steinmeier

Enclosures

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

In the Matter of the Joint Application of)
)
ACSI Local Switched Services, Inc. d/b/a)
e.spire and American Communication)
Services of Kansas City, Inc., d/b/a e.spire)
and Xspedius Management Co. Switched)
Services LLC, and Xspedius Management)
Co of Kansas City, LLC)
)
for Approval of (i) the Transfer of Substantially)
All of the Assets, Including the Customers, of)
the e.spire Operating Entities to the Xspedius)
Operating Entities; and (ii) the Discontinuance)
of Telecommunications Services in Missouri)
by the e.spire Operating Entities)

Case No. TM-2002-_____

MOTION FOR EXPEDITED TREATMENT

COME NOW ACSI Local Switched Services, Inc. ("ACSI Local") and American Communication Services of Kansas City, Inc. ("ACSI of Kansas City") (the "e.spire Operating Entities"); and Xspedius Management Co. Switched Services, LLC ("Xspedius Switched") and Xspedius Management Co. of Kansas City, LLC ("Xspedius Kansas City"), (the "Xspedius Operating Entities"), Joint Applicants herein, by their undersigned counsel, and pursuant to 4 CSR 240-2.080 (16), state the following to the Missouri Public Service Commission (the "Commission"):

1. The present application (the "Asset Transfer Application") is a companion to applications filed by Xspedius of Kansas City and Xspedius Switched for authority to provide intrastate interexchange, local exchange and basic local exchange telecommunications services in Missouri (the "Telecommunications Applications"). The Telecommunications Applications are being filed simultaneously with the Asset Transfer Application, and expedited treatment of those Applications is also being requested.

2. The bankruptcy of the e.spire Operating Entities has rendered it unstable and unless the customer base is transferred promptly there is the risk that service quality will degrade or service will be interrupted to the detriment of the e.spire Operating Entities' customers.

3. Joint Applicants are requesting that the Commission grant expedited consideration of this application and enter its order approving the same as soon as practically possible. The anticipated date for the transfer of assets from the e.spire Operating Entities to the Xspedius Operating Entities is July 8, 2002, or as soon thereafter as the necessary governmental approvals can be obtained. Thus, the Joint Applicants, in the Joint Application in this matter, expressed their hope that the Commission could grant approval of the transfer by June 30, 2002. The Joint Applicants recognize and appreciate that this would be an extremely quick turnaround, but are trying to accomplish closing as soon as absolutely possible in order to avoid any degradation of service or service quality due to e.spire's financial condition. In rendering its approval on an accelerated basis, the customers of the e.spire Operating Entities will not face the risk of poor quality of service, interruption or disconnection which might occur as a consequence of e.spire's financial status.

4. To ensure a seamless transition and avoid customer confusion or inconvenience, written notification by letter was sent to the affected e.spire Operating Entities customers at least thirty (30) days prior to the transfer, explaining the change in service provider in accordance with applicable FCC and state requirements for changing a customer's presubscribed carrier; a copy of that notification is attached to the Asset Transfer Application as **Exhibit B**.

5. There will be no negative effect on e.spire Operating Entities' customers or the general public if the Commission grants all expedited relief sought herein as soon as practically possible.

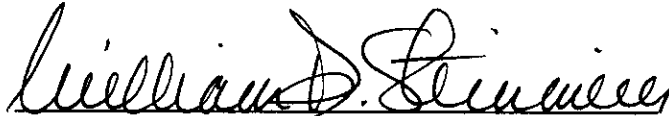
6. For these reasons, good cause exists for the expedited treatment of the

application.


7. This pleading was filed simultaneously with the application to which it relates, and therefore was filed as soon as it could have been filed. The transaction was approved by the Bankruptcy Court on June 5, 2002. The large number of entities and jurisdictions involved in this transaction, highlighted in a footnote in the Joint Application, has made the legal logistics difficult to accomplish more quickly. Application processes similar to those initiated here are also being undertaken in many other jurisdictions simultaneously.

8. WHEREFORE, Petitioners respectfully request the Commission to expedite its consideration of the application herein.

Respectfully submitted,



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SWITCHED SERVICES, LLC, AND
XSPEDIUS MANAGEMENT CO. OF KANSAS
CITY, LLC

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 the General Counsel of the Missouri Public Service Commission, and to the Office of Public Counsel, on this 24th day of June 2002.


William D. Steinmeier