

FILED³

FEB 25 2003

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

**Missouri Public
Service Commission**

In the Matter of the Application of)

Tele globe USA Inc.,)

Tele globe USA LLC)

d/b/a Tele globe USA LLC (Missouri),)

and)

TLGB Corporation)

For Approval of Assignment of Assets)

And Related Transactions)

Case No. _____

MOTION FOR EXPEDITED TREATMENT

COME NOW Tele globe USA Inc. ("Old Tele globe"), Tele globe USA LLC d/b/a Tele globe USA LLC d/b/a Tele globe USA LLC (Missouri) ("New Tele globe") and TLGB Acquisition, LLC ("TLGB") (together, "Applicants"), by and through counsel, and for their Motion for Expedited Treatment pursuant to 4 CSR 240-2.060(17) hereby state:

1. On February 25, 2003 Old Tele globe and New Tele globe filed an application for authority to transfer assets (the "Application"). The filing of this Application is one step in a comprehensive transaction arising out of Old Tele globe's bankrupt status. Also on February 25, 2003, New Tele globe 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 "Certification Application").

2. The transfer of assets, as described in the Application, is scheduled to occur as soon as the Commission approves the Transaction.

3. Applicants respectfully request the Commission to issue an Order approving the Application to be come effective as soon as possible. Specifically, Applicants request that the Commission approve the application for certification 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, Applicants request 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 Applicants have been mindful of the need to structure a transaction and proceed as quickly as possible to avoid any confusion or inconvenience to consumers. 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. Applicants 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, the Applicants respectfully request that the Commission grant this Motion for Expedited Treatment and issue its order granting the relief requested in the Application with an effective date no later than March 28, 2003.

Respectfully submitted,

By:



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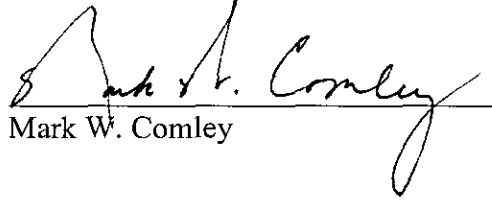
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Counsel to Teleglobe USA Inc. and
Teleglobe USA LLC d/b/a Teleglobe
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Dated: February 25, 2003

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