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BALTIMORE **NEW YORK** PHILADELPHIA FASTON RESTON

August 17, 1999

## *VIA FEDERAL EXPRES*S

Mr. Dale Hardy Roberts, Secretary/Chief Regulatory Law Judge Missouri Public Service Commission 301 West High Street, Room 530 TA-2000-31 Jefferson City, MO 65101

Re:

Motion to Amend Application of PRISM MISSOURI OPERATIONS, LLC for a Certificate of Public Convenience and Necessity to provide Local Exchange, Interexchange Carrier Access, and Interexchange Toll Telecommunications Services

Dear Mr. Roberts:

On behalf of Prism Missouri Operations, LLC ("Prism"), we are submitting an original and fourteen (14) copies of a Motion to Amend Prism's Application for a Certificate of Public Convenience and Necessity to provide local exchange, interexchange carrier access, and interexchange toll telecommunications services within the State of Missouri which was filed on July 16, 1999. Please date-stamp and return the attached stamp-in copy in the enclosed self-addressed FedEx envelope.

Any questions regarding this filing should be directed to the undersigned counsel.

Sincerely,

Julie A. Kaminski

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**Enclosures** 

Office of Public Counsel

General Counsel

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

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| In the matter of the Application        |   | Sarvice Commission  Case No. TA-2000-31 |           |
|---|---|---|-----------|
| of Prism Missouri Operations, LLC for a | ) |   | Commissio |
| Certificate of Service Authority to     | ) | Case No. TA-2000-31                     | . "agion  |
| Provide Interexchange, Basic Local      | ) |   |           |
| Exchange, And Non-Switched, Private     | ) |   |           |
| Line Local Exchange Telecommunications  | ) |   |           |
| Services                                | ) |   |           |

## MOTION TO AMEND APPLICATION

Prism Missouri Operations, LLC ("Applicant"), has requested a certificate of service authority to provide basic local exchange telecommunications services in Missouri as well as classification as a competitive company. Applicant hereby moves the Missouri Public Service Commission ("Commission") to amend its application to request the standard waiver of 4 CSR 240-30.040 as set forth in the Commission's Notice and Schedule of Applications dated July 27, 1999.

Respectfully submitted,

PRISM MISSOURI OPERATIONS, LLC

By:

Julie Albanas Six

Julie A. Kaminski, Esq. Missouri Bar No.: 41713 Piper & Marbury, LLP. 1200 19<sup>th</sup> Street, N.W. Washington, DC 20036

August 17, 1999

Its Attorney