

**Before the  
MISSOURI PUBLIC SERVICE COMMISSION**

Application of	)	
	)	
BROADVIEW NP ACQUISITION CORP.	)	Case No. _____
D/B/A BROADVIEW NET PLUS	)	
	)	
for a Certificate of Service Authority to Provide	)	
Competitive Intrastate Interexchange	)	
Telecommunications Services	)	

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**MOTION FOR EXPEDITED TREATMENT**

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Comes now Broadview NP Acquisition Corp. d/b/a Broadview Net Plus (“Broadview”, “Applicant” or “Company”), by its undersigned counsel, and pursuant to 4 CSR 240-2.080 (17) states the following to the Missouri Public Service Commission (the “Commission”):

1. The present application (the IXC Application) is a companion to an application filed by Broadview for authority to acquire certain assets and the customer base of Network Plus, Inc. (the Asset Transfer Application). Broadview is not a certificated provider in Missouri and before it can be eligible to accept title and delivery of the assets, the IXC application must be approved. The Asset Transfer Application is being filing simultaneously with the IXC Application and is also proceeding under an expedited schedule at the Applicant’s request.

2. The pending bankruptcy of Network Plus, Inc. (“Network Plus”), which is described more fully in the Asset Transfer Application, 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 Network Plus's approximately ninety-four (94) customers.

3. Broadview is requesting that the Commission grant expedited consideration of this application and enter its order approving the same on or before June 30, 2002, in order to comply with the Sale Order entered by the United States Bankruptcy Court for Delaware.<sup>1</sup> In rendering its approval on an accelerated basis, the customers of Network Plus will not face of risk of poor quality of service, interruption or disconnection which might occur as a consequence of Network Plus's financial status.

4. To ensure a seamless transition and avoid customer confusion or inconvenience, written notification by letter will be received by the affected Network Plus 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 D*. Approval on or before June 30, 2002 will enable Broadview to attend to other matters related thereto. For these reasons, good cause exists for the expedited treatment of the application.

5. There will be no negative effect on Network Plus's customers or the general public if the Commission acts by June 30, 2002.

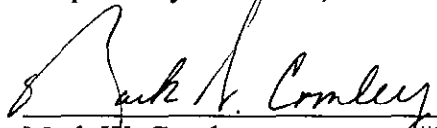
6. This pleading was filed simultaneously with the application to which it relates, and therefore was filed as soon as it could have ben filed.

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<sup>1</sup> Network Plus filed for bankruptcy protection on February 4, 2002 with the U.S. Bankruptcy Court for Delaware, and has been operating under the protection of Chapter 11 of the United States Bankruptcy Code (Case No. 02-10341). A Sale Order approving the transaction covered by the Asset Transfer Application was entered by the Court on March 20, 2002.

WHEREFORE, Broadview respectfully requests the Commission to expedite its consideration of the application herein so that approval is obtained by June 30, 2002.

Respectfully submitted,

  
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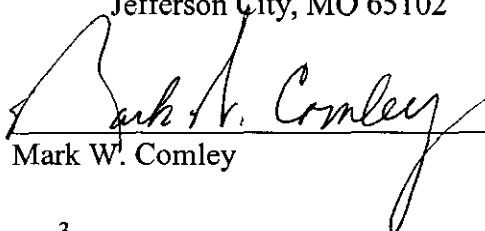
Counsel for **BROADVIEW NP  
ACQUISITION CORP. D/B/A  
BROADVIEW NET PLUS AND  
NETWORK PLUS, INC.**

#### Certificate of Service

I hereby certify that on this 18<sup>th</sup> day of April, 2002, a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to:

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