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April 3, 2000

FILED

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Dale Roberts
Chief Regulatory Law Judge
Public Service Commission
State of Missouri
P.O. Box 360
Jefferson City, Missouri 65102

Missouri Public
Service Commission

TA - 2000-598

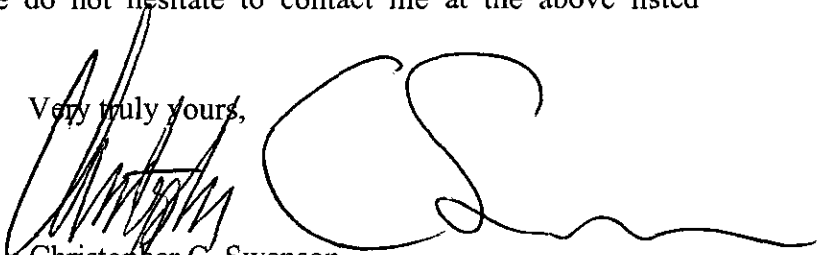
Re: Application for Certificate of Service Authority and for Competitive Classification of Universal Telecom, Inc.

Dear Mr. Roberts:

Pursuant to this Commission's Order directing filing dated March 31, 2000, enclosed herewith please find a revised Page 4 of the Application of Universal Telecom, Inc. seeking the variance of Commission Rule for CSR 240-2.060(4)(H), seeking variance to file tariff after the Notice of Application is published. Please incorporate same into the Application currently filed and advise whether this sufficiently complies with the Commission's Order.

If you have any questions, please do not hesitate to contact me at the above listed number.

Very truly yours,


Christopher C. Swenson

CCS/lal

Enclosures

cc: Kerry Ingle (w/ Enclosures)
Thomas P. Berra, Esq. (w/out Enclosures)

and maintenance. Consistent with the Commission's treatment of other certificated competitive local exchange telecommunications companies, UTI requests that the following statutes and regulations be waived for UTI and its prepaid, resold, basic local exchange service offerings pursuant to § 392.420 RSMo:

392.210.2	Uniform System of Accounts.
392.240(l)	Setting Just and Reasonable Rates.
392.270	Ascertain Property Valuation.
392.280	Depreciation Rates.
392.290	Issuance of Stocks and Bonds.
392.300.2	Acquisition of Stock
392.310	Issuance of Stocks and Bonds.
392.320	Stock Dividend Payment.
392.330	Issuance of Stocks and Bonds.
392.340	Reorganization(s).
4 CSR 240-10.020	Income on depreciation fund investments.
4 CSR 240-30.010 (2)(C)	Posting exchange rates at central offices.
4 CSR 240-30.040	Uniform System of Accounts.
4 CSR 240-32.030 (4)(C)	Exchange boundary maps.
4 CSR 240-33.030	Inform customers of lowest priced service.
4 CSR 240-35	Bypass Reporting.

Upon information and belief, the above-referenced rules and statutory provisions have been waived to other local exchange carriers.

6. Applicant has not filed its proposed tariff with the application but instead seeks a variance of Commission rule 4 CSR 240-2.060(4)(H) so that its tariff can be filed after the Notice of Applications is published and third parties are given the opportunity to intervene. Accordingly, Applicant anticipates filing its tariff at or about the Intervention Deadline date as determined by the Missouri Public Service Commission. Once filed, the proposed tariff, which has a 45-day effective date, will contain the rules and regulations applicable to its customers, a description of the services offered, and a list of rates associated with such services.

V. PUBLIC CONVENIENCE AND NECESSITY

1. UTI submits that the public interest will be served by the Commission's approval of this Application because it serves the public convenience and necessity. The Telecommunications Act of 1996 has established a national policy that competition in local exchange markets is in the public interest, and Section 253 of the Federal Act prohibits states from imposing requirements that would constitute barriers to entry in the local exchange market.

2. Enhanced competition is beneficial to Missouri consumers because of the incentive among service providers to offer lower prices, and more innovative services. The advent of additional competitors such as UTI also has the positive impact of inducing both ILECs and CLECs to provide more responsive customer service. In addition, issuance of the requested certificate of service authority to provide prepaid basic local telecommunications services serves Missouri in that