BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)
Comcast Phone, LLC for Approval) Case No
of its Interconnection Agreement with)
Cellco Partnership d/b/a Verizon Wireless)

APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT

Comes now Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone ("Comcast Phone"), and hereby files this Application for Approval of an Interconnection Agreement (the "Agreement") between Comcast Phone and Cellco Partnership d//b/a Verizon Wireless (Verizon Wireless")¹, under the Telecommunications Act of 1996, Public Law No. 104-104 ("Federal Act"), and 4 CSR 240-3.513, stating the following:

A. PRELIMINARY MATTERS

- 1. Comcast Phone is a competitive local exchange carrier ("CLEC") in Missouri. Comcast's office and principal place of business are located at 1500 Market Street, Philadelphia, PA, 19102 and its telephone number is 215-665-1700.
- 2. By this Application, Comcast Phone seeks Commission approval of an Interconnection Agreement between Comcast Phone and Verizon Wireless, a provider of Commercial Mobile Radio Service in Missouri, pursuant to licenses issued by the Federal Communications Commission. Verizon Wireless's office and principal place of business are located at 180 Washington Valley Road, Bedminster, New Jersey, 07921. Verizon Wireless provides wireless telecommunications service in nearly the entire State of Missouri.
 - 3. Comcast Phone's certificate of good standing is attached hereto as Attachment A.
 - 3. Correspondence, pleadings, and orders in this matter should be addressed to:

21265926\V-1

¹ The following Verizon Wireless entities are also parties to the Interconnection Agreement: CyberTel Cellular Telephone Company, St. Joseph CellTelco and Verizon Wireless (VAW) LLC, all CMRS providers.

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B. INTERCONNECTION AGREEMENT REACHED

4. Comcast Phone presents to this Commission for approval an Interconnection Agreement negotiated, executed, and approved pursuant to the terms of the Federal Act. After comprehensive, good faith negotiations Comcast Phone and Verizon Wireless executed the Agreement on January 5, 2006. The Agreement is attached hereto as Attachment B.

C. REQUEST FOR APPROVAL

5. Comcast Phone seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act and Missouri law. Comcast Phone believes that the implementation of this Agreement complies fully with Section 252(e) of the Telecommunications Act of 1996 because the Agreement is consistent with the public interest, convenience and necessity, and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, provides interconnectivity, and increases customer choices for telecommunications services.

6. Comcast Phone respectfully requests that the Commission grant expeditious approval of this Agreement, without change, suspension or other delay in its implementation. This is a bilateral Agreement, reached as a result of negotiations and compromise between competitors, and intervention by other parties is neither necessary nor appropriate.

D. STANDARD FOR REVIEW

- 7. The statutory standards of review are set forth in Section 252(e) of the Telecommunications Act of 1996 which provides as follows:
 - (1) APPROVAL REQUIRED.--Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted shall approve or reject the agreement, with written findings as to any deficiencies.
 - (2) GROUNDS FOR REJECTION.--The State commission may only reject --
 - (A) an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that --
 - (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
 - (ii) the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity; . . .
- 8. The Agreement fully complies with the criteria applicable for approval, and does not violate any of the criteria to be applied for rejection. Thus, the Agreement should be approved.
- 9. Comcast Phone does not have any pending action or final unsatisfied judgments or unsatisfied judgments or adverse decisions from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three years of the date of this Application.

10. Comcast Phone does not have any annual report or assessments which are overdue.

E. CONCLUSION

WHEREFORE, Comcast Phone respectfully requests that the Commission approve the attached Interconnection Agreement between Comcast Phone of Missouri, LLC and Cellco Partnership d//b/a Verizon Wireless.

Respectfully submitted,

SONNENSCHEIN NATH & ROSENTHAL

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ATTORNEYS FOR COMCAST PHONE OF MISSOURI, LLC

VERIFICATION

STATE OF MISSOURI)	
)	SS
COUNTY OF JACKSON)	

COMES NOW Mark P. Johnson, being of lawful age and duly sworn, who swears and affirms as follows:

- 1. My name is Mark P. Johnson, and I am an attorney for Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone ("Comcast Phone"). In that capacity, I am authorized to verify the statements contained in the Application above, and the information contained therein, on behalf of Comcast Phone.
- 2. The information contained in the above-described document is true and accurate to the best of my knowledge and belief.

Mark P. Johnson

Subscribed and sworn to before me this 29th day of March, 2006.

Notary Public

My Commission Expires:

ERIN E. MILLER
Notary Public - Notary Seal
STATE OF MISSOURI
Jackson County

My Commission Expires: June 29, 20

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed, postage prepaid, this day of March, 2006, to:

Office of the Public Counsel 200 Madison Street, Suite 650 P.O. Box 2230 Jefferson City, Missouri 65102-2230

General Counsel Missouri Public Service Commission 200 Madison Street P.O. Box 360 Jefferson City, Missouri 65102

Mohn