

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
MAY 11 2000

Missouri Public
Service Commission

In the Matter of the Application of)
Everest Connections Corporation for a)
Certificate of Service Authority to Provide)
Intrastate Interexchange and Non-Switched)
Local Exchange Telecommunications)
Services within the State of Missouri and)
for Competitive Classification.)

Case No. TA-2000-623

MOTION TO AMEND APPLICATION BY INTERLINEATION

Comes now Everest Connections Corporation ("Applicant" or "Everest"), by and through counsel and pursuant to 4 CSR 240-2.080.21, and for its Motion To Amend Application By Interlineation respectfully states as follows:

1. On April 5, 2000 Applicant filed its Application in this proceeding. In said Application, Applicant requested that the Commission waive certain statutes and rules consistent with the Commission's past treatment of other certificated interexchange/non-switched local exchange carriers. Such waivers in the past have been referred to in Commission notices as "the standard waivers". The specific waivers listed in Applicant's Application were the standard waivers routinely granted prior to April 30, 2000.

2. The Commission recently revised and renumbered many of its rules affecting interexchange/non-switched local exchange carriers, effective April 30, 2000. This, in turn, changed the list of the standard waivers presumably to be granted after April 30, 2000.

3. While Applicant's list of requested waivers was appropriate at the time of filing, this list would not be appropriate after April 30, 2000.

4. New rule 4 CSR 240-2.080(21) allows an applicant to amend any pleading at any time by leave of the Commission and would apply to the instant Application by virtue of 4 CSR 240-

2.010(13).

5. Rather than re-file its entire Application to reflect this one change, Applicant requests that it be permitted to amend its Application by this Motion To Amend Application By Interlineation. The Commission recently allowed this procedure to address a similar situation in Case No. TA-2000-625 (essential.com, Inc.), even though in that case leave of the Commission was not required by the pleading amendment rule applicable at that time.

6. Accordingly, Applicant hereby amends its Application as follows: on page 3, paragraph 5, delete all the statutes and rules listed therein and insert in lieu thereof the following:

<u>Statutes</u>	<u>Rules</u>
392.210.2	4 CSR 240-10.020
392.240(1)	4 CSR 240-30.010 (2) (C)
392.270	4 CSR 240-30.040
392.280	4 CSR 240-33.030
392.290	4 CSR 240-35
392.300.2	
392.310	
392.320	
392.330	
392.340	

7. In addition, Applicant also is this date filing substitute tariff sheets which contain certain changes requested by the Staff. Applicant has included with that filing substitute tariff sheet no. 2 which also contains the post-April 30, 2000 standard waiver list.

WHEREFORE, Applicant Everest Connections Corporation requests that the Commission grant this Motion To Amend Application By Interlineation and that Applicant's Application filed on April 5, 2000 be amended as specified hereinabove.

Respectfully submitted,

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ATTORNEY FOR APPLICANT
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent to the General Counsel's Office and the Office of the Public Counsel by hand-delivery this 11th day of May, 2000.

Charles Brent Stewart