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February 1, 2000

HAND DELIVERED

FILED²

FEB 1 2000

**Missouri Public
Service Commission**

TA-2000-468

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
301 West High Street, Floor 5A
Jefferson City, MO 65101

Re: Application of Williams Local Network, Inc. for a Certificate of Service Authority to Provide Interexchange and Non-Switched Local Exchange Telecommunications Services in the State of Missouri and for Competitive Classification

Dear Secretary Roberts:

Enclosed for filing in the above-captioned matter please find:

Original and fourteen (14) copies of an Application for Certificate of Service Authority and for Competitive Classification

Please note that Appendix 2 of this Application is the proposed tariff.

If you have any questions, please contact me.

Very truly yours,

LATHROP & GAGE L.C.

Paul S. DeFord

By:

Paul S. DeFord

PSD/jf
Enclosures
cc: Office of Public Counsel

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²
FEB 1 2000

Missouri Public
Service Commission

In the Matter of the Application of)

Williams Local Network, Inc.)

for a Certificate of Service Authority to Provide)
Interexchange and Non-Switched Local Exchange)
Telecommunications Services in the State of Missouri)
and for Competitive Classification)

Case No. TA-2000- 468

APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY
AND FOR COMPETITIVE CLASSIFICATION

Williams Local Network, Inc. ("WLNI" or "Applicant"), a Delaware corporation, by its undersigned counsel, hereby files this verified application respectfully requesting that the Missouri Public Service Commission ("Commission") issue an order that:

- (a) grants Applicant a Certificate of Service Authority to provide all forms of resold and facilities-based intrastate interexchange telecommunications service and non-switched local exchange telecommunications services in the State of Missouri pursuant to Chapter 392 of the Missouri Revised Statutes;
- (b) grants competitive status to Applicant; and
- (c) waives certain Commission rules and statutory provisions pursuant to Section 392.420, RSMo Cum. Supp. 1992.

In support of its application WLNI submits the following information:

I. DESCRIPTION OF THE APPLICANT

Applicant's legal name is Williams Local Network, Inc. WLNI intends to market its services in Missouri under the name Williams Local Network, Inc. WLNI maintains its principal place of business at:

Williams Local Network, Inc.
2600 One Williams Center
Tulsa, OK 74172
Tel: (918) 573-6000
Fax: (918) 573-0669

All correspondence and communications pertaining to this application and tariff should be directed to WLNI's Missouri attorney of record:

Paul S. DeFord
Lathrop & Gage L.C.
2345 Grand Blvd.
Suite 2500
Kansas City, Missouri 64108-2684
Tel: (816) 460-5827
Fax: (816) (816) 292-2001

And to:

Patrick D. Crocker
Early, Lennon, Peters & Crocker, P.C.
900 Comerica Building
Kalamazoo, Michigan 49007
Tel: (616) 381-8844
Fax: (616) 349-8525
E-mail: dgcrocker@voyager.net

Questions, correspondence and communications concerning the ongoing operations of WLNI following certification should be directed to:

Mickey S. Moon
Manager of Regulatory Affairs
Williams Local Network, Inc.
2800 One Williams Center
Tulsa, Oklahoma 74172
Tel: (918) 573-8771

Fax: (918) 573-0669
mickey.moon@wilcom.com

The following toll-free number is available for customer service inquiries:

1-888-465-9516

II. REQUIREMENTS OF 4 CSR 240-2.060(4)

1. Certificate of Authority to Transact Business in Missouri

WLNI was incorporated under the laws of Delaware on July 27, 1999, as a wholly owned subsidiary of Williams Communications, Inc. WLNI has qualified to transact business within the State of Missouri as a foreign corporation. A copy of Applicant's Certificate of Authority to Transact Business in Missouri is attached hereto as Appendix 1.

2. Description of Services

WLNI requests authority to provide resale and facilities-based interexchange service and dedicated (non-switched) local exchange telecommunications service throughout the State of Missouri. Initially, WLNI plans to offer "data CLEC" or "competitive access provider" ("CAP") services within the exchange service areas of Southwestern Bell Telephone, Sprint/United Telephone, and GTE only. Such services will include dedicated, point-to-point or point-to-multipoint transmission services for carrying digitized information between two or more points within an exchange (e.g., between central offices, between a central office and an Internet service provider or an interexchange carrier's point of presence, and between a customer's premise and an Internet service provider). WLNI plans to offer such services, on a private line basis, in bandwidths ranging from DS-1 (1.54 Mbps) to OC-48 (2.49 Gbps).

WLNI has no plans at this time to offer local exchange dial-tone service. In addition, WLNI plans to offer its these services to other telecommunications carriers, both competitive and incumbent local exchange carriers, and to Internet service providers, who may resell the Company's services as a stand-alone service pursuant to their tariffs or bundled with their own enhanced and/or basic services. WLNI does not plan to offer these services to residential customers.

WLNI plans to provide these services primarily over its own facilities, but may also rely on unbundled network elements obtained from incumbent local exchange carriers, as well as the resale of another telecommunications carrier's services. At this time, WLNI does not intend to provide service in areas of Missouri that are served by carriers that qualify as small or rural exchange carriers under the Telecommunications Act of 1996.

3. Managerial, Technical and Financial Qualifications

WLNI possesses the necessary managerial and technical expertise to provide the proposed interexchange, local exchange, and exchange access telecommunications services. WLNI also has ample financial resources to operate as a telecommunications provider.

4. Tariff Requirements

WLNI's proposed tariff, attached as Appendix 2 to this Application, contains the rules and regulations governing its proposed services, a description of the services, and a list of rates associated with such services. The proposed tariff has a forty-five (45) day effective date as required by 4 CSR 240-060(4)(h).

III. CLASSIFICATION AS A COMPETITIVE COMPANY

WLNI also seeks classification as a competitive company, with accompanying reduced regulation, pursuant to Section 392.361.2 and 392.361.3, RSMo. In making the determination of classification of an applicant the Commission may consider such factors as market share, financial resources and name recognition, among others. *See In the Matter of the Investigation for the Purpose of Determining the Classification of the Services Provided by Interexchange Telecommunications Companies within the State of Missouri*, 30 Mo. P.S.C. (N.S.) 16 (1989); *In the Matter of Southwestern Bell Telephone Company's application for Classification of Certain Services as Transitionally Competitive*, 1 Mo. P.S.C. 3d 479, 484 (1992). All the services a competitive company provides must be classified as competitive. WLNI submits that as a new market entrant, WLNI does not have the market share or name recognition to inhibit competition. Rather, the Commission's approval of this application will ensure competition with those carriers who do possess sufficient market share and name recognition to dominate the telecommunications service market in the state of Missouri. Allowing WLNI to compete with established carriers will bring benefits such as lower costs and better service to residents of the State of Missouri. The public interest benefits of competition justify a lesser degree of regulation for carriers such as WLNI.

WLNI will comply with all applicable statutes and Commission rules, regulations, decisions, and orders governing the provisions of Applicant's proposed services. WLNI, however, requests that, at a minimum, the following statutes and regulations be waived at this time consistent with the Commission's previous decisions regarding other telecommunications providers:

Interexchange and Local Exchange Telecommunications Services

Statutes

392.240(1)	--	rate making
392.270	--	valuation of property (rate making)
392.280	--	depreciation accounts
392.290	--	issuance of securities
392.310	--	stock and debt issuance
392.320	--	stock dividend payment
392.340	--	reorganization(s)
392.330, RSMo. Supp. 1997	--	issuance of securities, debts and notes

Commission Rules

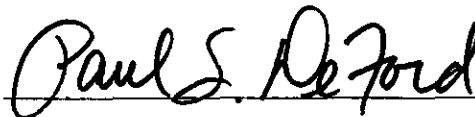
4 CSR 240-10.020	--	depreciation fund income
4 CSR 240-30.010(2)(c)	--	rate schedules
4 CSR 240-30.040	--	Uniform System of Accounts
4 CSR 240-32.030(1)(B)	--	exchange boundary maps
4 CSR 240-32.030(1)(C)	--	record keeping
4 CSR 240-32.030(2)	--	in-state record keeping
4 CSR 240-32.050(3)	--	local office record keeping
4 CSR 240-32.050(4)	--	telephone directories
4 CSR 240-32.050(5)	--	call intercept
4 CSR 240-32.050(6)	--	telephone number changes
4 CSR 240-32.070(4)	--	public coin telephone
4 CSR 240-33.030	--	minimum charges rule
4 CSR 240-33.040(5)	--	financing fees

IV. CONCLUSION

The telecommunications industry is characterized by unprecedented growth and increasing opportunity. WLNI's entry into the telecommunications market will enhance competition in the provision of telecommunications services throughout the State of Missouri, one of the primary goals of the 1996 Act. WLNI's telecommunications expertise ensures its ability to select the most economic and efficient services, thereby giving customers the best combination of price, quality, and customer service possible. The options thus made available to customers will increase their choices from among many innovative and reliable service offerings.

WHEREFORE, Applicant, Williams Local Network, Inc., respectfully requests that the Missouri Public Service Commission grant to it a Certificate of Service Authority to provide resold and facilities-based interexchange and non-switched local exchange telecommunications services within the State of Missouri; classify Applicant and its services as competitive; and grant a waiver of the statutes and regulations referenced above.

Respectfully Submitted,

A handwritten signature in black ink, reading "Paul S. DeFord", is written over a horizontal line.

Paul S. DeFord
Lathrop & Gage L.C.
2345 Grand Blvd.
Suite 2500
Kansas City, Missouri 64108-2684
Tel: (816) 460-5827
Fax: (816) (816) 292-2001
Missouri Bar No. 29509

Counsel for Williams Local Network, Inc., in the
State of Missouri

Dated: February 1, 2000

VERIFICATION OF APPLICANT

STATE OF Oklahoma)
COUNTY OF Tulsa) SS

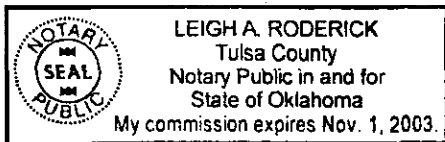
I, Mickey S. Moon, declare that I am Manager of Regulatory Affairs of Williams Local Network, Inc., the Applicant in the subject proceeding; that I have read the foregoing Application for a Certificate of Service Authority to Provide Telecommunications Services, and I declare under penalty of perjury that the foregoing is true, accurate, and correct to the best of my knowledge, information or belief, this 24th day of January, 2000.

Name: Mickey S. Moon

Title: Manager of Regulatory Affairs

Subscribed and sworn to before me,
a Notary Public in and for the State and County above named,
this 24th day of January, 2000.

Leigh A. Roderick
(SEAL) Notary Public



APPENDICIES

Appendix 1 Certificate of Authority to Transact Business in Missouri

Appendix 2 Proposed Tariff

Verification

Certificate of Service

APPENDIX 1

Certificate of Authority to Transact Business in the State of Missouri

STATE OF MISSOURI



Rebecca McDowell Cook
Secretary of State

CORPORATION DIVISION - CERTIFICATE OF AUTHORITY

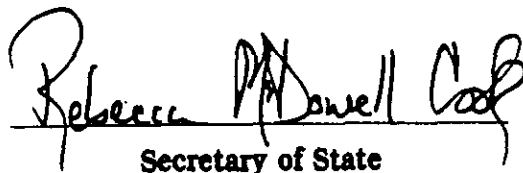
WHEREAS,
WILLIAMS LOCAL NETWORK, INC.

USING IN MISSOURI THE NAME
WILLIAMS LOCAL NETWORK, INC.

HAS COMPLIED WITH THE GENERAL AND BUSINESS CORPORATION LAW WHICH GOVERNS FOREIGN CORPORATIONS; BY FILING IN THE OFFICE OF THE SECRETARY OF STATE OF MISSOURI AUTHENTICATED EVIDENCE OF ITS INCORPORATION AND GOOD STANDING UNDER THE LAWS OF THE STATE OF DELAWARE.

NOW, THEREFORE, I, REBECCA MCDOWELL COOK, SECRETARY OF STATE OF THE STATE OF MISSOURI, DO HEREBY CERTIFY THAT SAID CORPORATION IS FROM THIS DATE DULY AUTHORIZED TO TRANSACT BUSINESS IN THIS STATE, AND IS ENTITLED TO ALL RIGHTS AND PRIVILEGES GRANTED TO FOREIGN CORPORATIONS UNDER THE GENERAL AND BUSINESS CORPORATION LAW OF MISSOURI.

IN TESTIMONY WHEREOF, I HAVE SET MY
HAND AND IMPRINTED THE GREAT SEAL OF
THE STATE OF MISSOURI, ON THIS, THE
16TH DAY OF NOVEMBER, 1999.


Secretary of State



\$155.00