BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)		
Reunion Communications, Inc.)	Case No.	XA-2011-0234
For a Certificate of Service Authority to)	Tracking No.	. YX-2011-0352
Provide Interexchange Telecommunications)	_	
Services in the State of Missouri and for)		
Competitive Classification)		

APPLICATION

COMES NOW Reunion Communications, Inc. ("Reunion" or "Applicant"), by its undersigned counsel, and pursuant to Sections 392.410, 392.420, 392.430, 392.440, 392.245.5 (8) and 392.361, RSMo. and 4 CSR 240-2.060 and 4 CSR 240-3.510, and files this Application for certificate of service authority to provide competitive interexchange telecommunications service in the State of Missouri. Applicant respectfully requests the Commission issue an order that:

- (a) grants Applicant a certificate of service authority to provide intrastate interexchange telecommunications services, pursuant to Chapter 392 of the Revised Statutes of Missouri;
- (b) grants competitive status to Applicant and Applicant's requested services pursuant to Section 392.361 RSMo.;
- (c) waives certain Commission rules and statutory provisions pursuant to Sections 392.245.5 (8), 392.420 and 392.361 RSMo; and
- (d) approves the proposed tariff being filed contemporaneously with this Application.

In support of its Application, Reunion states as follows:

 Applicant is a corporation duly organized and existing under and by virtue of the laws of the State of Illinois. The Company is authorized to conduct business as a foreign corporation within Missouri. In compliance with 4 CSR 240-2.060(1)(C), the Company has attached a copy of its certificate of authority as Exhibit A. The nature

The Company's legal name and principal address and telephone number are:

Reunion Communications, Inc. 106 W. Calendar Avenue #190 LaGrange, Illinois (IL) 60525

of Reunion's business is telecommunications.

Phone: (630) 243-7414 Fax: (630) 243-7417

 All inquiries, correspondence, communications, pleadings, notices, orders and decisions relating to this case should be addressed to:

William D. Steinmeier William D. Steinmeier, P.C. 2031 Tower Drive P.O. Box 104595 Jefferson City, Missouri (MO) 65110-4595

Phone: (573) 659-8672 Fax: (573) 636-2305 E-Mail: wds@wdspc.com

With a copy to:

Leon Nowalsky Nowalsky, Bronston & Gothard, APLLC 1420 Veterans Blvd. Metairie, Louisiana (LA) 70005

Phone: (504) 832-1984 Fax: (504) 831-0892

E-Mail: Inowalsky@nbglaw.com

All general correspondence from the Commission after certification should be

forwarded to the Company care of its regulatory contact as follows:

Mark Widbin, President

Reunion Communications, Inc.

106 W. Calendar Avenue #190

LaGrange, Illinois (IL) 60525

Phone: (630) 243-7414

Fax: (630) 243-7417

3. The Company proposes to provide resold switched long distance interexchange

services to business customers on a statewide basis. The Company will not offer

local exchange (non-switched private line) services.

4. The Company is a telecommunications company which possesses the technical and

managerial expertise to provide the services it proposes.

5. The Applicant also possesses the necessary financial resources to provide the

requested services.

6. In accordance with 4 CSR 240-2.060(6)(C), Applicant is contemporaneously

submitting its proposed tariff with a forty-five day effective date for approval by the

Commission. The tariff contains the rules and regulations applicable to its

customers, description of services offered and list of rates associated with such

services. The Company requests that the Commission approve its P.S.C. Mo. Tariff

No. 1 simultaneously with granting a certificate of service authority in this case.

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- Applicant will not unjustly discriminate among its customers as is prohibited under Section 392.200 RSMo.
- 8. Applicant is a competitive provider of competitive interexchange telecommunications services and thus requests competitive classification pursuant to Section 392.361 RSMo and 4 CSR 240-2.060(6)(A). Applicant believes its proposed services will be subject to sufficient competition to justify a lesser degree of regulation. Further, when granted the certificate of service authority requested herein, Applicant will be competing with other telecommunications companies in Missouri offering the same or similar services as Applicant.
- 9. Applicant is willing to comply with all applicable Commission rules, except those which are specifically waived by the Commission. Consistent with the Commission's treatment of other certificated competitive interexchange telecommunications companies, Applicant requests that the following statutes and regulations be waived for Applicant and its interexchange service offerings:

STATUTES

§ 392.210.2	-	Uniform System of Accounts
§ 392.240.1	-	Rates-Rentals-Service & Physical Connections
§ 392.270	-	Valuation of Property (Ratemaking)
§ 392.280	-	Depreciation Accounts
§ 392.290		Issuance of Securities
§ 392.300	-	Acquisition of Stock
§ 392.310		Issuance of Stock and Debt
§ 392.320	-	Stock Dividend Payment
§ 392.330		Issuance of Securities, Debts and Notes
§ 392.340	-	Reorganizations

COMMISSION RULES

4 CSR 240-10.020	Depreciation Records
4 CSR 240-30.040	Uniform System of Accounts
4 CSR 240-32.060	Engineering and maintenance
4 CSR 240-32.070	Quality of Service
4 CSR 240-32.080	Service objectives and surveillance levels
4 CSR 240-33.040(1-3) and (5-10)	Billing and payment standards
4 CSR 240-33.045	Clear identification and placement of charges on bills
4 CSR 240-33.080(1)	Company name and toll-free number on bills
4 CSR 240-33.130(1), (4) and (5)	Operator service requirements

- 10. Applicant submits that the public interest will be served by Commission approval of this application because Applicant's proposed services will create and enhance competition and expand customer service options, and offer service options consistent with the legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter 392 RSMo. Prompt approval of this application also will expand the availability of innovative, high quality, and reliable telecommunications services within the State of Missouri.
- 11. The Company will resell its services to other telecommunications companies.
- 12. Applicant does not have any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer

service or rates, which action, judgment or decision has occurred within three (3) years of the date of the application.

- 13. No annual reports or assessment fees are overdue from Applicant.
- 14. Applicant acknowledges that 4 CSR 240-4.020 (2) requires any regulated entity to give 60-days' notice prior to filing any case "likely to be a contested case." 4 CSR 240-4.020 (2) (B) provides that a party may request a waiver of that section for good cause. Applicant hereby requests a waiver of the 60-day notice requirement because: (1) this application is unlikely to result in a hearing; (2) the typical noncontested nature of this type of application provides good cause for waiving the requirement; and (3) no communication has occurred with the Commission within the scope of 4 CSR 240-4 prior to the filing of this Application.

WHEREFORE, Applicant, Reunion Communications, Inc., respectfully requests that

the Commission: (1) grant it certificate of service authority to provide intrastate

interexchange telecommunications services within the State of Missouri; (2) grant

Applicant and its proposed services competitive status; (3) waive the application of the

above-referenced statutes and Commission rules; (4) approve Reunion's separately-

submitted tariff; and (5) grant a waiver of 4 CSR 240-4.020(2) if deemed applicable.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier, Mo. Bar #25689

WILLIAM D. STEINMEIER, P.C.

2031 Tower Drive

P.O. Box 104595

Jefferson City, MO 65110-4595

Tel.: (573) 659-8672

Fax: (573)636-2305

Email: wds@wdspc.com

COUNSEL FOR REUNION COMMUNICATIONS,

INC.

Dated: January 13, 2011

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served electronically on the General Counsel's Office and the Office of the Public Counsel this 13th day of January 2011.

/s/ William D. Steinmeier
William D. Steinmeier

State of Illinois)
) ss.
County of)

VERIFICATION

I, Mark Widbin, being duly sworn according to law, depose and say that I am the President of Reunion Communications, Inc., that I am authorized to and do make this verification for it; and that the facts set forth in the above application are true and correct to the best of my knowledge, information and belief.

SIGNATURE: Mark Wishi

TITLE:

President

Subscribed and sworn to before me this 31st day of December, 2010.

Notary Public Laura A. M. Sweeney

My Commission expires: 4-23-2014

EXHIBIT A

MISSOURI SECRETARY OF STATE CERTIFICATE OF AUTHORITY

State of Missouri



Robin Carnahan Secretary of State CERTIFICATE OF AUTHORITY

WHEREAS,

REUNION COMMUNICATIONS, INC. F00811207

using in Missouri the name

REUNION COMMUNICATIONS, 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 Illinois.

NOW, THEREFORE, I, ROBIN CARNAHAN, 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 hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 17th day of April, 2007.

Polini Camahan

Secretary of State

