

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

FILED

JUN 01 2005

Missouri Public
Service Commission

In the matter of the Application of)
SBC Advanced Solutions, Inc.)
for approval of its Interconnection and/or)
Resale Agreement Under Sections 251 and)
252 of the Telecommunications Act of 1996)
with Southwestern Bell Telephone, L.P.)
d/b/a SBC Missouri, pursuant to)
47 U.S.C. § 252.)

Case No. _____

**APPLICATION OF SBC ADVANCED SOLUTIONS, INC.
FOR APPROVAL OF INTERCONNECTION AND/OR
RESALE AGREEMENT UNDER SECTIONS 251 AND 252
OF THE TELECOMMUNICATIONS ACT OF 1996 WITH
SOUTHWESTERN BELL TELEPHONE, L.P.
D/B/A SBC MISSOURI**

COMES NOW SBC Advanced Solutions, Inc. ("SBC-ASI") and hereby applies for approval by the Missouri Public Service Commission ("Commission") of the accompanying INTERCONNECTION AND/OR RESALE AGREEMENT UNDER SECTIONS 251 AND 252 OF THE TELECOMMUNICATIONS ACT OF 1996 (the "Agreement") voluntarily entered into by SBC-ASI and Southwestern Bell Telephone, L.P. d/b/a SBC Missouri ("SBC Missouri"), pursuant to the federal Telecommunications Act of 1996 (the "Act") under 47 U.S.C. § 252(e).

1. SBC-ASI is a Delaware Corporation, authorized to do business in the state of Missouri. Copies of SBC-ASI's Certificate of Authority to transact business in Missouri from the Missouri Secretary of State and SBC-ASI's Articles of Incorporation were filed in Re SBC Advanced Solutions, Inc. Application for a Certificate of Service Authority to Provide Advanced Telecommunications within the State of Missouri, Case No. TA-2000-260, and are incorporated herein by reference. Pursuant to the Commission's Order Approving Interexchange And Non-

Switched Local Exchange Certificate Of Service Authority in Case No. TA-2000-260, SBC-ASI provides telecommunications service in Missouri. SBC-ASI's principal office is located at 1010 N. St. Mary's Street, San Antonio, Texas 78215.

2. All correspondence, communications, and orders and decisions of the Commission issued in this matter should be sent to:

Larry W. DORITY
FISCHER & DORITY, P.C.
101 Madison, Suite 400
Jefferson City, Missouri 65101
Telephone: (573) 636-6758
Facsimile: (573) 636-0383

3. SBC-ASI has no 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. No Missouri annual reports or assessment fees are overdue.

In support of this Application, SBC-ASI states the following:

I. INTERCONNECTION AGREEMENT REACHED

SBC-ASI presents to this Commission for approval the Agreement that was negotiated and executed between SBC-ASI and SBC Missouri pursuant to the terms of the Act. Following good faith negotiations to address all of the complex issues involved in such an agreement, the parties signed the Agreement on February 7, 2005, and hereby file the Agreement, together with twenty-four (24) appendices incorporated therein. There are no outstanding issues between SBC-ASI and SBC Missouri that need the assistance of mediation or arbitration.

II. REQUEST FOR APPROVAL

SBC-ASI seeks the Commission's approval of the Agreement, consistent with the provisions of the Act. SBC-ASI believes that the implementation of this Agreement complies fully with Section 252(e) of the Act because the Agreement is consistent with the public interest, convenience and necessity, and does not discriminate against any telecommunications carrier. The Agreement promotes interconnectivity and diversity in providers, and will increase customer choices for telecommunications services. SBC-ASI respectfully requests that the Commission grant approval of this Agreement, without change, suspension or other delay in its implementation. This is a bilateral agreement, reached as a result of negotiation and compromise between SBC-ASI and SBC Missouri.

III. STANDARD FOR REVIEW

The statutory standards of review are set forth in Section 252(e) of the Act, which provides:

(e) APPROVAL BY STATE COMMISSION

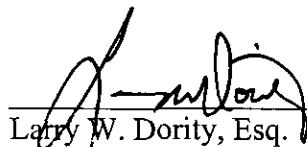
- (1) APPROVAL REQUIRED.** – Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted shall approve or reject the agreement, with written findings as to any deficiencies.
- (2) GROUNDS 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; . . .

IV. MISSOURI LEGISLATION

The negotiated and executed Agreement is consistent with Missouri Senate Bill 507, which became effective on August 28, 1996.

WHEREFORE, SBC Advanced Solutions, Inc. respectfully requests the Commission to enter an Order approving its Interconnection and/or Resale Agreement Under Sections 251 and 252 of the Telecommunications Act of 1996 with Southwestern Bell Telephone, L.P. d/b/a SBC Missouri.

Respectfully submitted,



Larry W. Dority, Esq. MBN 25617
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Facsimile: (573) 636-0383
E-mail: lwdority@sprintmail.com

Attorneys for SBC Advanced Solutions, Inc.

COUNTY OF DALLAS:
STATE OF TEXAS:

AFFIDAVIT OF DAVID G. HAMMOCK

Before me, the Undersigned Authority, on this 23rd day of March, 2005 personally appeared David G. Hammock who, upon being by me duly sworn on oath deposed and said the following:

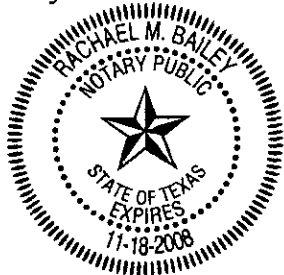
1. My name is David G. Hammock. I am over the age 21, of sound mind and competent to testify to the matters stated herein. I am responsible for SBC Advanced Solutions, Inc.'s negotiation and execution of interconnection agreements with other telecommunications providers. I have personal knowledge of the agreement between Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri") and SBC Advanced Solutions, Inc. ("SBC-ASI").
2. This agreement establishes general terms, conditions and rates for interconnection, physical collocation, virtual collocation, operations support systems, structure access, lawful UNEs, xDSL, and line splitting. This agreement is the result of negotiation. I believe that this agreement between SBC Missouri and SBC-ASI is in the public interest and comports with the relevant requirements of state law.
3. Further, consistent with the policy provision of PURA, I believe that this agreement fosters, encourages and accelerates the continuing development and emergence of a competitive advanced telecommunications environment and infrastructure and to that end, not only advances, but, also protects the public interest.
4. I am not aware of any provision in this agreement that discriminates against any telecommunications carrier that is not a party to this agreement. The terms of this agreement are available to any similarly situated local service provider in negotiating a similar agreement.
5. I am not aware of any outstanding issues between the parties that need the assistance of mediation or arbitration at this time.

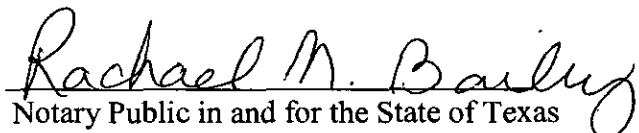
Further Affiant sayeth not.



David G. Hammock
RVP-Carrier/Supplier Management
SBC Advanced Solutions Inc.

Sworn and Subscribed to before me this 23rd day of March, 2005, to certify which witness my hand.




Notary Public in and for the State of Texas

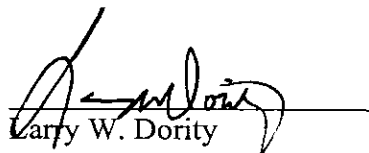
CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 1st day of June, 2005 to:

Office of the Public Counsel
200 Madison Street
Jefferson City, MO 65101

Dana K. Joyce, General Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

Leo J. Bub
General Attorney - Missouri Area
One SBC Center, Room 3518
St. Louis, MO 63101



Larry W. Dority