

MISSOURI STATE DISCOUNT TELEPHONE  
804 ELKINS LAKE  
HUNTSVILLE, TEXAS 77340

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FILED

FEB 1 2000

January 31, 2000

Mr. Dale Hardy Roberts  
Secretary / Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Missouri Public  
Service Commission

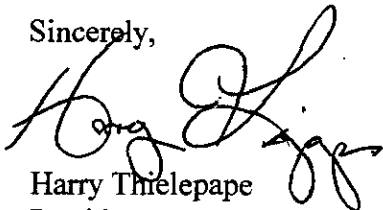
TO - 2000 - 469

Dear Mr. Roberts,

Please find the attached original and 14 copies of the Application for approval of the Interconnection Agreement between Missouri State Discount Telephone and Alltel Communication Company.

If there are additional questions, please contact me at once.

Sincerely,



Harry Thielepape  
President

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

**FILED**

FEB 1 2000

Missouri Public  
Service Commission

Contract No. 70-2000-469

**RESALE AGREEMENT**

**BETWEEN**

**ALLTEL COMMUNICATIONS TELEPHONE COMPANY**

**AND**

**MISSOURI STATE DISCOUNT TELEPHONE**

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

**FILED**

FEB 1 2000

Missouri Public  
Service Commission

IN THE MATTER OF THE APPLICATION OF ]  
ALLTEL COMMUNICATIONS FOR APPROVAL ]  
OF INTERCONNECTION AGREEMENT WITH ]  
MISSOURI STATE DISCOUNT TELEPHONE ]  
PURSUANT TO SECTION 252(e) OF THE ]  
TELECOMMUNICATIONS ACT OF 1996 ]

CASE NO. 70-2000-469

**APPLICATION OF MISSOURI STATE DISCOUNT TELEPHONE FOR  
APPROVAL OF INTERCONNECTION AGREEMENT**

COMES NOW, MISSOURI STATE DISCOUNT TELEPHONE and file  
this Application for Approval of an Interconnection Agreement (the "Agreement")  
between ALLTEL COMMUNICATIONS and Missouri State Discount Telephone  
("MSDT"), pursuant to Section 252(e) of the Telecommunications Act of 1996 ("the  
Federal Act") and would respectfully show the Missouri Public Service Commission  
(the "Commission") the following:

**I. INTERCONNECTION AGREEMENT REACHED**

MISSOURI STATE DISCOUNT TELEPHONE presents to this  
Commission for approval an agreement negotiated and executed pursuant to the  
terms of the Federal Act (Agreement, Attachment 1). After weeks of intensive good  
faith negotiations to address all of the complex issues involved in such an agreement,  
the parties have executed the Interconnection Agreement between ALLTEL  
COMMUNICATIONS and MSDT on January 10, 2000, and filed herewith,  
together with the four (4) appendices incorporated therein.

**II. REQUEST FOR APPROVAL**

MISSOURI STATE DISCOUNT TELEPHONE seeks the Commission's  
approval of the Agreement, consistent with the provisions of the Federal Act.  
MSDT believes that the implementation of this Agreement complies fully with  
Sections 252(e) of the Federal Act because the Agreement is consistent with the

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

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 telecommunication services.

MISSOURI STATE DISCOUNT TELEPHONE respectfully request 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 the parties do not believe a docket or intervention by other parties is necessary or appropriate.

### **III. STANDARD FOR REVIEW**

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

Section 252(e) of the Federal Act:

#### **(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 to shall approve or reject the agreement, with written findings as to any deficiencies.

(2) **GROUND FOR REJECTION.** The State Commission may only reject -

(A) an agreement (or any portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or

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

- (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; or

**IV. MISSOURI LEGISLATION**

The negotiated and executed Agreement is consistent with Missouri Legislation, Senate Bill No. 507, which became effective on August 28, 1996.

**V. CONCLUSION**

For the reasons set forth above, MISSOURI STATE DISCOUNT TELEPHONE respectfully prays that the Commission approve the Agreement expeditiously.

Respectfully submitted,

**MISSOURI STATE DISCOUNT TELEPHONE**

By: 

Harry L. Thielepape  
804 Elkins Lake  
Huntsville, Texas 77340  
(409) 435-1400  
FAX (409) 293-8522

**PRESIDENT**

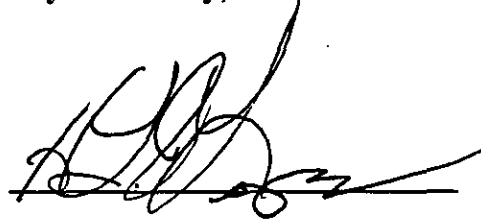
**BEFORE THE PUBLIC SERVICE COMMISSION OF THE  
STATE OF MISSOURI**

**VERIFICATION**

**I, Harry L. Thielepape, under penalty of perjury, certify as follows:**

**I am President of Missouri State Discount Telephone. I am authorized to make this verification on behalf of Missouri State Discount Telephone. I have read the foregoing "Application of ALLTEL for Approval of Interconnection Agreement with Missouri State Discount Telephone pursuant to Sections 252(e) of the Telecommunications Act of 1996" and know the contents thereof, and the facts stated therein are true and correct to the best of my knowledge, information and belief.**

**Executed in the State of Texas on the 13th day of January, 2000.**



**Harry L. Thielepape  
President  
Missouri State Discount Telephone**

**Sworn before me and subscribed in my presence by Harry L. Thielepape this 13  
day of January, 2000.**

  
**Notary Public**

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

**Notary Public**

**CERTIFICATE OF SERVICE**

**I do hereby certify that a true and correct copy of the foregoing document was mailed via Airborne Express to Dale Hardy Roberts, Secretary/Chief Regulatory Law Judge, Missouri Public Service Commission, 301 W. High Street, Rm. 530, Jefferson City, MO 65101 and was mailed, postage prepaid, this 13th day of January, 2000 the following:**

**Office of the Public Counsel  
301 W. High Street, Rm 250  
Jefferson City, MO 65101**

**Mr. Harry L. Thielepape  
Missouri State Discount Telephone  
804 Elkins Lake  
Huntsville, TX 77340**