

STEWART & KEEVIL, L.L.C.
ATTORNEYS AT LAW

ORIGINAL

CHARLES BRENT STEWART
JEFFREY A. KEEVIL

1001 CHERRY STREET
SUITE 302
COLUMBIA, MISSOURI 65201-7931

TELEPHONE (573) 499-0635
FACSIMILE (573) 499-0638

February 13, 2001

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
P.O. Box 360
Jefferson City, Missouri 65102

FILED²
FEB 13 2001
Missouri Public
Service Commission

Re: Dobson Cellular Systems, Inc. *TO - 2001-444*
Interconnection Agreement with ALLTEL Communications Services Corporation

Dear Mr. Roberts:

Please find enclosed for filing on behalf of Dobson Cellular Systems, Inc.: (1) an original and eight (8) copies of the Application For Approval Of Interconnection Agreement; and (2) an original and five (5) copies of the subject Interconnection Agreement. The pages of the Interconnection Agreement have been numbered seriatim in the bottom right hand corner of each page. A complete copy of this filing has been sent this date to the General Counsel's Office and the Office of the Public Counsel. Thank you.

Sincerely,

Brent Stewart
Brent Stewart

CBS/bt

Enclosure

cc: General Counsel's Office
Office of the Public Counsel
David M. Wilson
Timothy J. Duffy

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FEB 13 2001 *nh*

Missouri Public
Service Commission

In the Matter of the Application of Dobson)
Cellular Systems, Inc. for Approval of)
its Interconnection Agreement with)
ALLTEL Communications Services)
Corporation Pursuant to Section 252(e) of)
the Telecommunications Act of 1996.)

Case No. TO-2001- 444

APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT

COMES NOW Applicant Dobson Cellular Systems, Inc. ("Dobson" or "Applicant"),
by and through counsel and pursuant to Section 252(e) of the Telecommunications Act of 1996
("the Federal Act") and the applicable provisions of 4 CSR 240-2.060, and for its Application
for approval of its Interconnection Agreement with ALLTEL Communications Services
Corporation ("ALLTEL") respectfully states as follows:

I. 4 CSR 240-2.060 Requirements

1. Applicant's legal name is Dobson Cellular Systems, Inc. Applicant's principal
office is located at 13439 N. Broadway Ext., Suite 200, Oklahoma City, Oklahoma 73114-
2257, telephone number (330) 509-6525, fax number (330) 565-9562.

2. All correspondence, notices, orders or decisions of the Commission regarding this
Application should be sent to:

Charles Brent Stewart
STEWART & KEEVIL, L.L.C.
1001 Cherry Street
Suite 302
Columbia, Missouri 65201
(573) 499-0635
(573) 499-0638 (fax)
stewart499@aol.com

Timothy J. Duffy
Senior Vice President
Dobson Cellular Systems, Inc.
13439 N. Broadway Ext., Suite 200
Oklahoma City, Oklahoma 73114
(330) 509-6525
(330) 565-9562
tim.duffy@dobson.net

with a copy to:

Ronald L. Ripley, Vice President, Senior Corporate Counsel
13439 N. Broadway Ext., Suite 200
Oklahoma City, Oklahoma 73114-2257
1-800-522-9404
(405) 529-8515 (fax)
rripley@dobson.net

3. Dobson is an Oklahoma corporation duly authorized, either directly or through its affiliates, to do business in Missouri. Dobson is engaged in the business of providing commercial mobile radio services as licensed by the Federal Communications Commission. Pursuant to 4 CSR 240-2.060(1)(C), Dobson's relevant documents from the Missouri Secretary of State's Office are attached hereto and incorporated herein by reference as Appendix A.

4. Pursuant to the relevant provisions of Section 386.020 RSMo Supp. 1999, Dobson is not a "public utility" and therefore is not subject to the general regulatory jurisdiction of this Commission. However, this Commission does have jurisdiction over both the subject Interconnection Agreement pursuant to the Federal Act, and over the co-signatory to the Interconnection Agreement, incumbent basic local exchange carrier ALLTEL, pursuant to the relevant provisions of Chapters 386 and 392 RSMo.

5. Pursuant to 4 CSR 240-2.060(K) and (L), Dobson affirmatively states that: (i) it 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 this Application; and (ii) no annual report or assessment fees are overdue.

6. As this not a joint application, any information relating to ALLTEL is not here

being submitted. However, Dobson notes that this Commission has already and recently approved similar commercial mobile radio services interconnection agreements between ALLTEL and other wireless carriers¹ and to the extent this additional information is required for purposes of this Application, the information provided by ALLTEL in those prior cases may be deemed to be incorporated herein by reference pursuant to 4 CSR 240-2.060(G), if necessary. Consistent with the Commission's past practice, Dobson anticipates that the Commission automatically will make ALLTEL a party to this proceeding when the Commission issues its standard notice in this case.

II. The Interconnection Agreement

7. Dobson presents to this Commission for its approval the Commercial Mobile Radio Services Interconnection Agreement, with attachments ("the Agreement"), negotiated and executed by and between Dobson and ALLTEL on January 3, 2001 pursuant to the terms of the Federal Act. An executed original of the Agreement with attachments, with the pages numbered sequentially in the bottom right hand corner, is attached hereto as Appendix B to this Application.

8. Dobson seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. Dobson believes that the implementation of the Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and because it does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, promotes

¹ See, e.g., Case No. TO-2001-360 (Universal Telecom, Inc.) and Case No. TO-2000-482 (Southwestern Bell Wireless, Inc.).

interconnectivity, and increases customer choices for telecommunications in Missouri. As such, approval of the Agreement also is consistent with the policies of Chapter 392 RSMo.

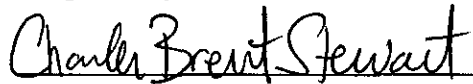
9. The Agreement is in all substantive respects similar to other ALLTEL Commercial Mobile Radio Services Interconnection Agreements which have been previously approved or which are currently under review by this Commission.² There are no outstanding issues between the parties which require arbitration by this Commission. In order to avoid additional post-approval filings, Dobson already has sequentially numbered the pages of the Agreement in the right hand corner of each page consistent with the Commission's past practice. As such, Dobson requests prompt approval of the Agreement without change, suspension or other delay in its implementation.

10. The appropriate standards of review of the Agreement by this Commission are found in Section 252(e) of the Federal Act and are well known to the Commission. Dobson respectfully submits that under these standards, this Commission should not reject and should approve the Agreement, consistent with the Commission's past treatment in prior cases involving similar ALLTEL-negotiated commercial mobile radio services interconnection agreements.

WHEREFORE, Applicant Dobson Cellular Systems, Inc. respectfully requests that the Commission expeditiously approve the Interconnection Agreement between Applicant and ALLTEL Communications Services Corporation.

² Cases now pending include Case Nos. TO-2001-103 and TO-2001-400.

Respectfully submitted,



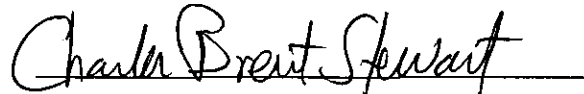
Charles Brent Stewart, MoBar#34885
STEWART & KEEVIL, L.L.C.
1001 Cherry Street, Suite 302
Columbia, Missouri 65201
(573) 499-0635
(573) 499-0638 (fax)
Stewart499@aol.com

David M. Wilson, CaBar#039479
WILSON & BLOOMFIELD, LLP
1901 Harrison Street, Suite 1630
Oakland, California 94612
(510) 625-8250
(510) 625-8253 (fax)
dmw@wblaw.net

ATTORNEYS FOR APPLICANT
DOBSON CELLULAR SYSTEMS, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Application was sent this date to the General Counsel's Office and the Office of the Public Counsel by hand-delivery this 13th day of February, 2001.



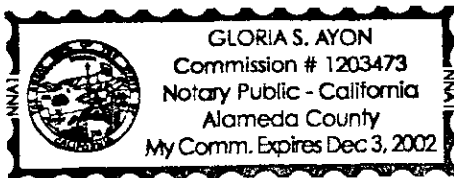
VERIFICATION

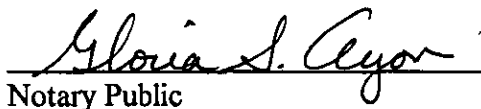
STATE OF CALIFORNIA)
)
COUNTY OF SAN FRANCISCO) ss.

David M. Wilson, being first duly sworn, on his oath and in his capacity as Counsel of Dobson Cellular Systems, Inc., states that he is authorized to execute on behalf of Dobson Cellular Systems, Inc. this Application and has knowledge of the matters stated in this Application, and that said matters are true and correct to the best of his knowledge and belief.


David M. Wilson

Subscribed and sworn to before me this 17th day of January, 2001.




Notary Public

My Commission Expires: 12-03-02

DOBSON CELLULAR SYSTEMS, INC.
COMMERCIAL MOBILE RADIO SERVICES
INTERCONNECTION AGREEMENT
FEBRUARY 13, 2001

APPENDIX A

MISSOURI SECRETARY OF STATE DOCUMENTS

No. F00478694

STATE OF MISSOURI



Matt Blunt
Secretary of State

CORPORATION DIVISION

CERTIFICATE OF CORPORATE RECORDS


DOBSON CELLULAR SYSTEMS, INC.

using in Missouri the name

DOBSON CELLULAR SYSTEMS, INC.

I, MATT BLUNT, Secretary of State of the State of Missouri and Keeper of the Great Seal thereof, do hereby certify that the annexed pages contain a full, true and complete copy of those certain original documents on file and of record in this office for which certification has been requested.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 7th day of FEBRUARY, 2001.


Secretary of State



No. F00478694

STATE OF MISSOURI



Rebecca McDowell Cook
Secretary of State

CORPORATION DIVISION - CERTIFICATE OF AUTHORITY

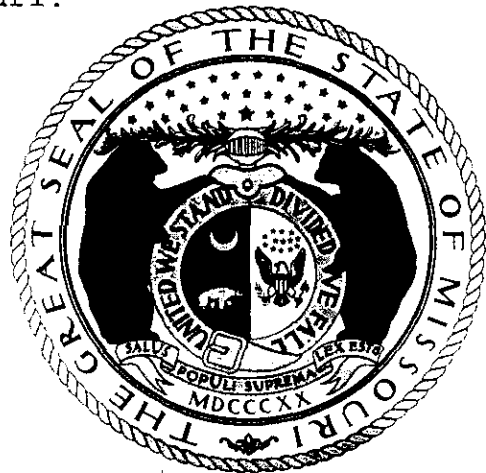
WHEREAS,
DOBSON CELLULAR SYSTEMS, INC.

using in Missouri the name
DOBSON CELLULAR SYSTEMS, 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 OKLAHOMA.

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 11th day of JANUARY, 2000.



Rebecca McDowell Cook
Secretary of State

\$155.00

OFFICE OF THE SECRETARY OF STATE



CERTIFICATE OF GOOD STANDING
DOMESTIC CORPORATION

I THE UNDERSIGNED, Secretary of State of the State of Oklahoma, do hereby certify that I am, by the laws of said state, the custodian of the records of the state of Oklahoma relating to the right of corporations to transact business in this state and am the proper officer to execute this certificate.

I FURTHER CERTIFY that DOBSON CELLULAR SYSTEMS, INC. is a corporation duly organized and existing under and by virtue of the laws of the state of Oklahoma and is in good standing according to the records of this office. This certificate is not to be construed as an endorsement, recommendation or notice of approval of the corporation's financial condition or business activities and practices. Such information is not available from this office.

IN TESTIMONY WHEREOF, I have hereunto set my hand and caused to be affixed the Great Seal of the State of Oklahoma at the City of Oklahoma City, this

10th day of January, 2000

Mae Hunter

Secretary of State

By: *Jessie Garrison*



State of Missouri

Rebecca McDowell Cook, Secretary of State

P.O. Box 778, Jefferson City, Mo. 65102
Corporation Division

FILED
AND CERTIFICATE OF
AUTHORITY ISSUED

JAN 11 2000

**Application for Foreign Corporation
for a Certificate of Authority**

Rebecca McDowell Cook
SECRETARY OF STATE

(Submit in duplicate with filing fee of \$155.00)

- (1) The corporation's name is Dobson Cellular Systems, Inc.
and it is organized and existing under the laws of the State of Oklahoma
- (2) The name it will use in Missouri is Dobson Cellular Systems, Inc.
- (3) The date of its incorporation was 5-22-90, (month/day/year),
and the period of its duration is perpetual
- (4) The address of its principal place of business (Address/City/State/Zip)
13439 Broadway Extension, Oklahoma City, Oklahoma 73114
- (5) The name and address of its registered agent and office in the State of
Missouri is (Name, Address, City/State/Zip)
C T CORPORATION SYSTEM, 120 South Central Avenue, Clayton, Missouri 63105
- (6) The specific purpose(s) of its business in Missouri are: _____
cellular service provider
- (7) The name of its officers and directors and their business addresses are as
follows:
- Officers** (Name/Address/City/State/Zip)
- President See List of Officers and Directors Attached
- Vice President _____
- Secretary _____

Treasurer _____

Board of Directors (Name/Address/City/State/Zip)

Director See List of Officers and Directors Attached

Director _____

Director _____

Director _____

(8) The effective date of this document is the date it is filed by the Secretary of State of Missouri, unless you indicate a future date, as follows:

(Date may not be more than 90 days after the filing date in this office)

In affirmation thereof, the facts stated above are true.

T. L. B. Assistant Secretary 12-30-99
(Authorized signature of officer or chairman of the board) (Title) (Date)

Note: You must have a current certificate of good standing or certificate of existence with this application. This may be obtained from the Secretary of State or other authority that issues corporate charters.

FILED
AND CERTIFICATE OF
AUTHORITY ISSUED

JAN 11 2000

Rebecca McDowell Cook
CLERK - DIV OF STATE