

WILLIAM D. STEINMEIER, P.C.

2031 TOWER DRIVE  
JEFFERSON CITY, MISSOURI (MO) 65109

WILLIAM D. STEINMEIER  
ATTORNEY AT LAW  
REGULATORY CONSULTANT  
(573) 659-8672  
FAX (573) 636-2305

MAILING ADDRESS:  
POST OFFICE BOX 104595  
JEFFERSON CITY, MISSOURI (MO)  
65110-4595

MARY ANN YOUNG  
ATTORNEY AT LAW  
OF COUNSEL  
(573) 634-8109  
FAX (573) 634-8224

March 14, 2000

FILED<sup>2</sup>

MAR 14 2000

Missouri Public  
Service Commission

Mr. Dale Hardy Roberts  
Executive Secretary-Chief Regulatory Law Judge  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102-0360

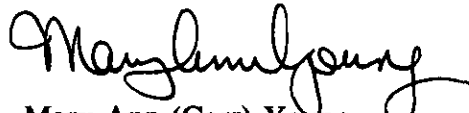
RE: Case No. 70-2000-572  
IP Communications Corporation's Application for Approval of  
Interconnection Agreement with Southwestern Bell Telephone Company

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the Application for Approval of Interconnection Agreement of IP Communications Corporation (IP), for filing with the Commission. The original and five copies of the Interconnection Agreement between IP and Southwestern Bell Telephone Company (SWBT) are also enclosed, per the Notice of Waiver of Interconnection Agreement Filing Requirements issued January 4, 1999, by the Secretary of the Commission. To my knowledge, a diskette copy of the Agreement is not available.

Thank you for your assistance in processing this filing. Copies of the Application and Interconnection Agreement are being served on the Office of Public Counsel and counsel for SWBT. If there are any questions, please call me at 634-8109.

Sincerely yours,

  
Mary Ann (Garr) Young

Enclosures

cc: Office of Public Counsel  
Southwestern Bell Telephone Company  
Mr. Scott McCollough

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
MAR 14 2000

Missouri Public  
Service Commission

Application of )  
 )  
IP Communications Corporation )  
 )  
for Approval of an Interconnection )  
Agreement Under the )  
Telecommunications Act of 1996 )

Case No. 10-2000-572

**APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT**

COMES NOW IP Communications Corporation (IP), and files its Application for Approval of Interconnection Agreement (Agreement) between IP and Southwestern Bell Telephone Company (SWBT) under the Telecommunications Act of 1996 (Federal Act). In support of that Application, IP states as follows:

**I. INTERCONNECTION AGREEMENT REACHED**

IP presents to this Commission for approval an Interconnection Agreement negotiated and executed pursuant to the terms of the Federal Act. A copy of the Agreement is provided as Attachment I. After extensive negotiations between SWBT and IP, the Agreement was executed by IP on February 6, 2000, and by SWBT on February 14, 2000. The Agreement consists of 677 pages, including exhibits and appendices. The pages have been numbered in the bottom right corner, seriatim, so there will be no need for the Commission to order a page-numbered copy to be filed after approval. There are no outstanding issues between IP and SWBT that need the assistance of mediation or arbitration.

## **II. REQUEST FOR APPROVAL**

IP seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act and Missouri law. The implementation of this Agreement complies fully with Section 252(3) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier.

IP respectfully requests 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 the parties.

## **III. STANDARD FOR REVIEW**

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

### **(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.

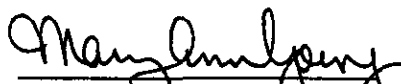
**IV. MISSOURI LAW**

The negotiated and executed Agreement is consistent with Missouri Law.

**V. CONCLUSION**

For the reasons set forth above, IP respectfully requests that the Commission approve the Agreement expeditiously.

Respectfully submitted,



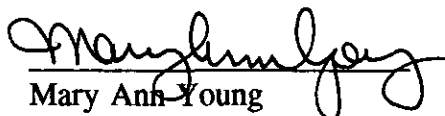
MARY ANN (GARR) YOUNG #27951  
William D. Steinmeier, P.C.  
P.O. Box 104595  
2031 Tower Drive  
Jefferson City MO 65110-4595  
Telephone: 573-634-8109  
Facsimile: 573-634-8224

ATTORNEY FOR IP COMMUNICATIONS  
CORPORATION

Dated: March 14, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of this document was hand-delivered or mailed by first class mail, postage prepaid, to the Office of Public Counsel and counsel for Southwestern Bell Telephone Company this 14th day of March 2000.



Mary Ann Young