

# PAUL H. GARDNER

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February 10, 2009

**FILED<sup>2</sup>**

FEB 13 2009

Colleen Dale  
Secretary Missouri Public Commission  
200 Madison Street  
Jefferson City, MO 65101

**Missouri Public  
Service Commission**

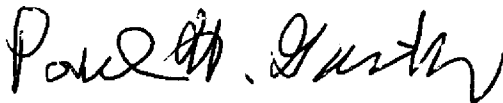
RE: In the matter of the Application of iNetworks Group, Inc. for Certificate of  
Service Authority: Case No.:TA-2009-0258

Dear Ms. Dale:

Enclosed please find signed original and three copies of the Amended Application of iNetworks Group, Inc. in the above referenced case. This Application contains changes made at the request of MO PSC staff including my signature which was not contained in the original electronically filed Application. A copy has been forwarded to Office of Public Counsel.

Thank for your attention to this matter.

Sincerely,



Paul H. Gardner

PHG/cm

FILED<sup>2</sup>

FEB 13 2009

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

Missouri Public  
Service Commission

In the Matter of the Application of )  
iNetworks Group, Inc., for a Certificate ) Case No. TA-2009-0258  
Service Authority to provide Basic Resold Local )  
and Interexchange Telecommunications Services )  
in the State of Missouri and to classify such )  
services and the Company as Competitive )

AMENDED APPLICATION

Comes now iNetworks Group, Inc. ("Applicant" or "Company"), by the undersigned counsel and hereby applies pursuant to Sections 392.361, 392.410, 392.420, 392.430 and 392.450 RSMo for certificate of service authority to provide Resold Basic and Interexchange Telecommunications Services in the State of Missouri and to classify iNetworks Group, Inc.'s services and the Company as Competitive. In support of its application, iNetworks Group, Inc states as follows:

1. Applicant is a Corporation, duly organized and existing under the laws of the State of Illinois with its principal place of business located at 125 S. Wacker Drive, Suite 2510, Chicago, IL 60606. Phone: (312) 212-0822. A copy of the Applicants' Articles of Incorporation is attached as **Exhibit A**. A copy of the certificate issued by the Missouri Secretary of State authorizing the Company to transact business in the State of Missouri is attached as **Exhibit B**.
2. Correspondence and other communications concerning this application should be addressed to:

Paul H. Gardner, MO Bar #28159  
Attorney at Law  
801 W. Vesper  
Blue Springs, MO 64015  
Phone: (816) 229-9111  
Fax: (816) 229-9196  
E-mail: [patstarkelaw02@live.com](mailto:patstarkelaw02@live.com)  
Attorney for iNetworks Group, Inc.

Judith A. Riley, Regulatory Counsel  
5909 NW Expressway, Suite 101  
Oklahoma City, OK 73132  
Phone: (405) 755-8177

3. iNetworks Group Inc. is a reseller of telecommunications services with no pre-paid service offerings. The Applicant provides resold local exchange, interexchange, dedicated point-to-point private line service and dedicated Internet access to business customers only. The company's voice product offerings include local dial tone, local calling features, bundled feature packages, 1+ outbound long and inbound toll free service. All services are offered over both switched and dedicated facilities including Intergraded Services Digital Network (ISDN). The company's data product offerings provides bandwidth starting and T-1 (1,544 Mbps) and proceeds into the high speed optical carrier networks up to OC192. All operator services and access to 911 services will remain with the underlying carrier. The Company will not provide alternated operator services. The Company intends to offer service throughout all exchanges currently served by the incumbent local exchange telecommunications companies of Southwestern Bell Telephone, AT&T of Missouri, Embarq and Century Tel.

4. iNetworks Group, Inc. possesses the technical and managerial expertise and experience necessary to provide the services it proposes. Attached hereto as **Exhibit C** are the biographies of key management personnel.
5. iNetworks, Group, Inc. seeks classification of its services as Competitive.
6. The Company will offer resold Basic Local Telecommunications Service as a separate and distinct service in accordance with the applicable Missouri Law and requests local exchange service authority for Applicant's private line service offering. The Company will also give full consideration to equitable access for all Missouri customers free of discrimination or prejudice as required by Missouri law.
7. iNetworks Group, Inc. is willing to comply with all applicable Commission's rules and is willing to meet all relevant service standards, including, but not limited to billing, quality of service, and tariff filings in a manner consistent with the Commission's requirements for incumbent local exchange carrier(s) with whom iNetworks Group, Inc. seeks this authority to compete. In addition, iNetworks Group, Inc. agrees that, pursuant to Sections 392.455(3) & (4) RSMo 2000, its service area shall be no smaller than a complete exchange.
8. Consistent with the Commission's treatment of other certificated competitive local exchange telecommunications companies, iNetworks Group, Inc. requests the following statutes and regulations be waived for the Company and its service offerings of both resold Basic Local Exchange and Interexchange Telecommunications:

392.210.2	Establish Uniform Systems of Accounts for Annual Reports
392.240(1)	Setting Just and Reasonable Rates
392.270	Ascertain property values
392.280	Establish depreciation accounts
392.290	Issuance of securities
392.300.2	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	Reorganization(s)
4 CSR 240-10.020	Depreciation fund income
4 CSR 240-30.040	Uniform System of Accounts
4 CSR 240-3.550(5)(c)	Telecommunication Company Records and Reports

As these statutes and rules are designed primarily for non-competitive telecommunications companies, application of these provisions to Applicant would be inconsistent with Applicant's requested status as a competitive company.

9. Applicant's proposed Competitive Local Exchange Tariff No. 1 Interexchange Services Tariff No. 2 have been filed with the Commission in conjunction with this Application.
10. The applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involves customer service rates, which action, judgment or decision has occurred within three years of the date of this Application. No commission annual reports or assessment fees are overdue.
11. Grant of this Application will further the public interest by expanding the availability of competitive telecommunications services in the State of Missouri. In addition, intrastate offering of these services is in the public

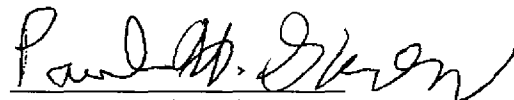
interest because the services will provide Missouri customers with access to new technologies and service choices, and can permit customers to achieve increased efficiencies and cost savings. In particular, the public will benefit directly, through the use of the competitive services to be offered by Applicant, and indirectly, because the presence of Applicant in this market will increase the incentives for other telecommunications providers to operate more efficiently, offer more innovative services, reduce their prices, and improve their quality of services.

12. Applicant agrees, notwithstanding the provisions of Section 392.500 RSMo 2000 that as a condition of competitive classification, unless otherwise ordered by the Commission, Applicant's originating and terminating switched exchange access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each ILEC within those service area(s) that Applicant seeks to provide service. Additionally, pursuant to the commission's Report and Order in Case No. TO-99-596, Applicant agrees that if the ILEC in whose service area it operates decreases its originating and/or terminating access rates, Applicant shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates within thirty (30) days of the ILEC's reduction in order to maintain the cap on switched exchange access rates.

WHEREFORE, Applicant, iNetworks Group, Inc., respectfully requests the Missouri Public Service Commission grant it a certificate of service authority to provide

resold Basic Local Exchange and resold Interexchange Telecommunications Services within the State of Missouri. Applicant also requests classification as a competitive telecommunications company, a waiver of the rule and statutory provisions as requested in paragraph 8 of this Application and approval of the iNetworks proposed Tariffs filed separately from this Application

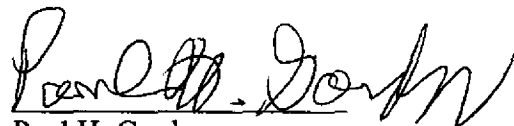
Respectfully submitted,



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(816) 229-9196  
[starke02@swbell.net](mailto:starke02@swbell.net)  
Attorney for iNetworks Group, Inc.

#### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was mailed this 10th day of February, 2009 via U.S. Mail to the Office of Public Counsel at 200 Madison Street, Suite 650, P.O. Box 2230, Jefferson City, Missouri 65102.

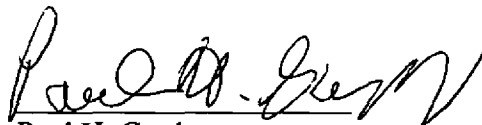


Paul H. Gardner

**ATTORNEY VERIFICATION**


STATE OF MISSOURI     )  
                                      ) ss.  
COUNTY OF COLE     )

I, Paul H. Gardner, being duly sworn, do hereby certify, depose and state that I am the Attorney for iNetworks Group, Inc., applicant in this proceeding; that I have read the above and foregoing Application and that the allegations therein contained are true and correct to the best of my knowledge, information and belief; and that I am authorized to verify the foregoing application by the above said applicant.

  
Paul H. Gardner

Subscribed and sworn to before me, a Notary Public, this 10<sup>th</sup> day of Feb, 2009.

Cathy Mann - Notary Public  
Notary Seal for State of  
Missouri - Jackson County  
My Commission Expires 11-30-11  
Commission #07384166

  
Notary Public