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April 19, 2004

VIA FEDERAL EXPRESS

Mr. Dale H. Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

RE: Granite Telecommunications, LLC
Case No. TK-2004-0465

FILED²
APR 20 2004
Missouri Public
Service Commission

Dear Mr. Roberts:

Please find enclosed for filing an original and nine copies of a Motion for Expedited Treatment and Retroactive Effective Date in the above-referenced case. Please return a "filed" stamped copy of this motion to me in the enclosed return envelope.

By copy of this letter, I am sending a copy of the enclosure to the Office of General Counsel and Office of Public Counsel on this date.

Thank you for your consideration in this matter. Please call me if you have any questions.

Very truly yours,


Mark P. Johnson

MPJ/rgr
Enclosures
cc: Office of Public Counsel (w/enclosures)
Office of General Counsel (w/enclosure)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

APR 20 2004

Missouri Public
Service Commission

In the Matter of the Application of)
Granite Telecommunications, LLC for)
Approval of the Adoption of the SBC-13)
State Interconnection Agreement.)

Case No. TK-2004-0465

MOTION FOR EXPEDITED TREATMENT AND RETROACTIVE EFFECTIVE DATE

Comes now the Applicant, Granite Telecommunications, LLC ("Granite"), and pursuant to 4 CSR 240-2.080(16), moves for expedited treatment of its application for approval of an interconnection agreement with SBC, and for an effective date retroactive to the date on which Granite first filed the agreement with the Commission's Data Center. In support of this motion, Granite states the following:

1. In this proceeding Granite is seeking Commission approval of its 13-State Interconnection Agreement with SBC, which was signed by Granite and SBC in November, 2003.

2. On December 5, 2003, Granite sent to the Data Center a notice of adoption of the interconnection agreement and the signature pages. Granite's counsel followed the advice of the Data Center in making this filing.

3. Not until March 11, 2004, more than three months later, did the Data Center inform Granite that filing of the interconnection agreement itself would be required, and that the Data Center had overlooked Granite's December filing. Granite filed an application on March 15, 2004, and filed the agreement on April 1, 2004.

4. As a result of the delay in the anticipated approval of the interconnection agreement, Granite seeks expedited treatment and an effective date retroactive to

December, 2003, when approval was first sought. Granite requests that the Commission act on this request by April 23, 2004.

5. Absent expedited treatment of the application, Granite will continue to be unable to enter the Missouri market. Its entry has already been delayed several months. There is an obvious adverse impact on Granite, and Missouri consumers are also adversely affected due to the absence of Granite's contribution to competition in the state.

6. Granite has not delayed in filing this request for expedited treatment. Approval of this interconnection agreement has been a matter of confusion since December, and in fact Granite first learned of the Data Center mix-up more than three months after it occurred.

7. Granite also requests that the Commission give retroactive effect to the interconnection agreement. Absent retroactive effect of the agreement, Granite will suffer the consequences of an error committed by the Commission's Data Center.

WHEREFORE, Granite Telecommunications, LLC respectfully requests that the Commission give expedited treatment to this application, and that the Commission to approve Granite's SBC-13 State Interconnection Agreement with an effective date of December 5, 2003.

Respectfully submitted,

SONNENSCHEN NATH & ROSENTHAL

By: 

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ATTORNEYS FOR
GRANITE TELECOMMUNICATIONS, LLC


VERIFICATION

STATE OF MISSOURI)
)
COUNTY OF JACKSON) SS:

COMES NOW Mark P. Johnson, being of lawful age and duly sworn, who swears and affirms as follows:

1. My name is Mark P. Johnson, and I am an attorney for Granite Telecommunications, Inc. ("Applicant"). In that capacity, I am authorized to verify the statements contained in the pleading above, and the information contained therein, on behalf of Applicant.

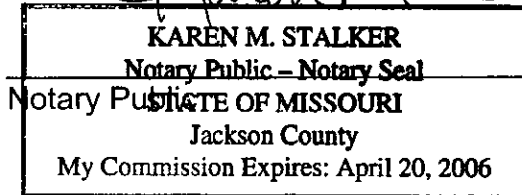
2. The information contained in the above-described document is true and accurate to the best of my knowledge and belief.



Mark P. Johnson

Subscribed and sworn to before me this 19th day of April, 2004.





My Commission Expires:

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed, postage prepaid, this 1st day of April, 2004, to:

Office of the Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, Missouri 65102-2230

David Meyer, Esq.
Deputy General Counsel
Missouri Public Service Commission
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102