### BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

IN THE MATTER OF THE	§		
APPLICATION OF SYNIVERSE	§		
TECHNOLOGIES, INC. FOR	§	Case No.	
APPROVAL OF AN INTERCONNECTION	§		
AGREEMENT UNDER THE TELE-	§		
COMMUNICATIONS ACT OF 1996	8		

#### APPLICATION FOR APPROVAL OF AN INTERCONNECTION AGREEMENT

COMES NOW SYNIVERSE TECHNOLOGIES, INC. ("Syniverse" or "Applicant") by its undersigned counsel, pursuant to 4 CSR 240-2.060 and 4 CSR 240-3.513(1) and hereby files its Application for Approval of an Interconnection Agreement between Applicant and Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T") under the Telecommunications Act of 1996 ("1996 Act"). In support of this Application, Applicant states as follows:

#### I. PARTIES

- 1. Syniverse is a corporation duly organized and existing under and by virtue of the laws of the State of Delaware and is duly authorized to conduct business in Missouri. Pursuant to relevant provisions of 4 CSR 240-2.060, a Certificate of Authority to transact business as a foreign entity is attached hereto and incorporated herein by reference as Appendix A. Applicant's principal place of business is 8125 Highwoods Palm Way, Tampa, Florida 33647-1776. On March 10, 2008, Applicant filed its application with the Missouri Public Service Commission for a certificate to provide resold and facilities-based basic local exchange, non-switched local exchange and interexchange telecommunications services, which has been assigned Case No. TA-2008-0299.
- 2. Applicant states, in accordance with 4 CSR 240-2.060(1)(k), that there are no pending actions or final unsatisfied judgments or decisions against Applicant in any state, federal

agency or court which involve customer service or rates for which action, judgment or decision has occurred within three (3) years of the date of this Application.

- 3. Pursuant to 4 CSR 240 240-2.060(1) (L), Applicant states that the Company does not have any overdue annual reports or assessment fees owed to the Commission.
- 4. AT&T is a Texas limited partnership with its principal offices in Missouri located at One Bell Center (which may now be called One AT&T Center), Suite 4210, Saint Louis, Missouri 63101. AT&T Missouri, a subsidiary of SBC Communications, Inc., is an incumbent local exchange carrier (ILEC) in Missouri.
- 5. All communications, notices, orders and decisions respecting this Application and proceeding should be addressed to:

Mark W. Comley Newman, Comley & Ruth P.C. 601 Monroe Street, Suite 301 Jefferson City, Mo 65102 (573) 634-2266 (573) 636-3306 (FAX) comleym@ncrpc.com David J. Robinson Syniverse Technologies, Inc. 8125 Highwoods Palm Way Tampa, FL 33647-1776 (813) 637-5940 (813) 637-5731 (FAX) david.robinson@syniverse.com

LEGAL DEPARTMENT, AT&T MISSOURI One AT&T Center, Room 3536 Saint Louis, Missouri 63101

#### And:

OFFICE OF PUBLIC COUNSEL Post Office Box 2230 Jefferson City, Missouri 65102

#### II. INTERCONNECTION AGREEMENT REACHED

6. Applicant presents to this Commission for approval an Interconnection Agreement entered into between AT&T and Applicant, executed pursuant to the terms of the 1996 Act and submitted as an interconnection agreement arrived at through negotiation pursuant to 4 CSR 240-3.513(1). A copy of the Interconnection agreement is attached hereto as Appendix B. This

agreement is a negotiated contract and is based upon the terms of the standard AT&T 13-STATE Interconnection Agreement that AT&T has entered into with other competitive telecommunications carriers. The Agreement was executed by Applicant on December 20, 2007 and by AT&T on December 10, 2007. There are no outstanding issues between Applicant and AT&T that need the assistance of mediation or arbitration.

#### III. REQUEST FOR APPROVAL

7. Applicant seeks the Commission's approval of the Agreement, consistent with the provisions of the 1996 Act and Missouri law. The implementation of this Agreement complies fully with Section 252(e) of the 1996 Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier.

#### IV. STANDARD OF REVIEW

- 8. The statutory standards of review are set forth in Section 252(e) of the 1996 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 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[.]

#### V. MISSOURI LAW

9. The executed Agreement is consistent with Missouri law.

#### VI. CONCLUSION

WHEREFORE, for the foregoing reasons, the Applicant respectfully requests that the Commission approve the Applicant's Interconnection Agreement with AT&T Missouri.

Respectfully submitted,

#### /s/ Mark W. Comley

Mark W. Comley #28847 NEWMAN, COMLEY & RUTH P.C. 601 Monroe Street, Suite 301 P.O. Box 537 Jefferson City, MO 65102-0537 (573) 634-2266 (573) 636-3306 FAX

Attorneys for Syniverse Technologies, Inc.

#### Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 16th day of April, 2008, to General Counsel's Office at gencounsel@psc.mo.gov; Office of Public Counsel at opcservice@ded.mo.gov;

I hereby certify that a true and correct copy of the above and foregoing document (without Appendix B) was sent by U.S. Mail, postage prepaid, on this 16<sup>th</sup> day of April, 2008 to:

LEGAL DEPARTMENT, AT&T MISSOURI One AT&T Center, Room 3536 Saint Louis, Missouri 63101

/s/ Mark W. Comley

# STATE OF MISSOURI



### Robin Carnahan Secretary of State

# CORPORATION DIVISION CERTIFICATE OF GOOD STANDING

I, ROBIN CARNAHAN, Secretary of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

#### SYNIVERSE TECHNOLOGIES, INC.

using in Missouri the name

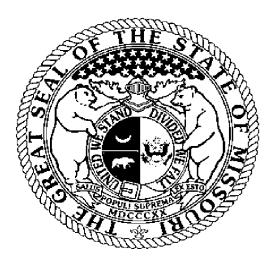
## SYNIVERSE TECHNOLOGIES, INC. F00407714

a DELAWARE entity was created under the laws of this State on the 23rd day of February, 1995, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 10th day of March, 2008

n Camahan

Secretary of State



Certification Number: 10526841-1 Reference:

Verify this certificate online at http://www.sos.mo.gov/businessentity/verification