

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

August 30, 1999

FILED

AUG 30 1999

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

Missouri Public
Service Commission

RE: Case No. TA-2000-196
Application of International Exchange Communications, Inc. d/b/a IE Com for
Certificate of Service Authority to Provide Interexchange Telecommunications Services

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the Interexchange
Telecommunications Service Application of International Exchange Communications, Inc.
d/b/a IE Com, for filing with the Commission.

Thank you for your assistance in processing this filing. A copy is being served on the
Office of Public Counsel and General Counsel. If there are any questions, please feel free to
call me at 634-8109.

Sincerely,


Mary Ann (Carr) Young

Enclosure

cc: Office of Public Counsel
General Counsel's Office
Mr. Ananda Mazumdar, Swidler Berlin

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FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

AUG 30 1999

Missouri Public
Service Commission

In the Matter of the Application of)
)
International Exchange Communications, Inc.)
d/b/a IE Com)
)
For a Certificate of Service Authority)
To Provide Interexchange Telecommunications)
Services and for Competitive Classification)
in the State of Missouri.)

Case No. TA-2000-196

**APPLICATION FOR A CERTIFICATE OF SERVICE AUTHORITY
AND COMPETITIVE CLASSIFICATION**

International Exchange Communications, Inc. d/b/a IE Com ("IE Com" or "Applicant"), by its undersigned counsel, and pursuant to § 392.440 RSMo. and 4 CSR 240-2.060(4), hereby submits its application for a Certificate of Service Authority to operate as a reseller of intrastate interexchange telecommunications services in the State of Missouri. Additionally, pursuant to §§ 392.361 and 392.420 RSMo., IE Com requests that it be classified as competitive, and requests that certain Commission rules and statutory provisions be waived pursuant to Section 392.420 RSMo. In support thereof, IE Com provides the following information, as well as its tariff:

I. QUALIFICATIONS

1. Applicant's legal name is International Exchange Communications, Inc. In Missouri, IE Com will do business under the registered fictitious name "IE Com." Applicant may be reached at its principal place of business:

500 Airport Blvd., Suite 340
Burlingame, California 94010
Telephone: (650) 375-6700
Facsimile: (650) 375-6799

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2. IE Com is organized under the laws of the State of Delaware. A copy of IE Com's Certificate of Authority to transact business in the state of Missouri as a foreign corporation is attached hereto as Exhibit A. IE Com is a wholly owned subsidiary of Pacific Gateway Exchange, Inc., a publicly traded Delaware corporation whose principal business is telecommunications.

3. All correspondence or communications pertaining to this application should be directed to Applicant's attorneys of record:

Grace R. Chiu
Anandashankar Mazumdar
Swidler Berlin Shereff Friedman, LLP
3000 K St., N.W., Suite 300
Washington, D.C. 20007-5116
Telephone: (202) 424-7500
Facsimile: (202) 424-7645

and:

Mary Ann (Garr) Young
William D. Steinmeier, P.C.
P. O. Box 104595
Jefferson City, Missouri 65110-4595
Telephone: (573) 634-8109
Facsimile: (573) 634-8224

4. Questions concerning the ongoing operations of Applicant following certification should be directed to:

Charles G. Taylor, Jr.
International Exchange Communications, Inc. d/b/a IE Com
901 Main St., Suite 2311
Dallas, Texas 75202

II. PROPOSED SERVICES

5. IE Com seeks authority to provide resold intrastate interexchange telecommunications services to subscribers to and from all points in the state of Missouri. IE Com proposes to provide resold interexchange services, including, but not limited to, direct-dial "1+" long-distance message telecommunications service ("MTS") and prepaid and postpaid calling card service to business and residential customers. MTS services are provided via Feature Group Access. IE Com's services are available on a full time basis, 24 hours a day, seven days a week.

6. IE Com's tariff, which contains the rules and regulations applicable to its customers, a description of the services offered, and a list of rates associated with such services, is being filed simultaneously with this Application and has a forty-five (45) day effective date as required by 4 CSR 240-060(4)(H).

7. IE Com possesses managerial and technical expertise to provide competitive interexchange telecommunications services in Missouri. IE Com's officers and other members of its management team are well qualified to execute its business plan, having extensive managerial, financial, and technical telecommunications experience.

8. IE Com has adequate financial resources to conduct its telecommunications operations as proposed in this Application.

9. IE Com provides interstate telecommunications services pursuant to a tariff filed with the Federal Communications Commission. IE Com is authorized, pursuant to certification, registration or deregulation, to provide resold interexchange service in Arkansas, California, Colorado, Connecticut, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Maine, Maryland, Massachusetts, Michigan, Mississippi, Montana, Nebraska, Nevada, New Hampshire, New

Jersey, New York, North Dakota, Ohio, Pennsylvania, Texas, Utah, Virginia, Wisconsin and Wyoming. IE Com is in the process of applying for authorization to provide intrastate interexchange services nationwide. Applications are currently pending in Arizona, Delaware, Hawaii, North Carolina, South Carolina, Tennessee, and Vermont.

10. IE Com's toll-free number for customer inquiries is (888) 551-0597.

II. CLASSIFICATION AS A COMPETITIVE TELECOMMUNICATIONS COMPANY AND WAIVER OF CERTAIN REGULATORY REQUIREMENTS

11. IE Com also requests classification of its proposed telecommunications services as competitive, with accompanying reduced regulation, pursuant to §§ 392.361 and 392.420 RSMo. Applicant respectfully requests that the Commission suspend, waive, or modify the application of the following statutory provisions and rules consistent with the Commission's treatment of other competitive interexchange carriers:

Statutes

| | | |
|--------------------|---|--|
| Section 392.240(1) | - | Rates - Average return on investment. |
| Section 392.270 | - | Property valuation. |
| Section 392.280 | - | Depreciation accounts. |
| Section 392.290 | - | Issuance of stocks and bonds. |
| Section 392.310 | - | Issuance of stock. |
| Section 392.320 | - | Stock dividends. |
| Section 392.330 | - | Issuance of securities, debts and rates. |
| Section 392.340 | - | Capitalization reorganization. |

Regulations

| | | |
|-----------------------------|---|--|
| 4 CSR 240-10.020 | - | Depreciation of fund income. |
| 4 CSR 240-30.010(2)(C) | - | Posting of exchange rates of central operating offices |
| 4 CSR 240-30.040 | - | Uniform System of Accounts |
| 4 CSR 240-32.030(1)(B)&(C)- | - | Exchange boundary maps |
| 4 CSR 240-32.030(2) | - | Record keeping. |
| 4 CSR 240-32.050(3)-(6) | - | Information concerning local service tariffs, maps, directories, intercept, and telephone numbers. |
| 4 CSR 240-32.070(4) | - | Coin telephone availability. |
| 4 CSR 240-33.030 | - | Information regarding lowest price available. |
| 4 CSR 240-33.040(5) | - | Financing fee. |

12. The above-referenced statutory provisions and rules have been waived with regard to other interexchange carriers in prior cases. These statutory provisions or rules are principally designed to apply to noncompetitive telecommunications carriers. It would be inconsistent with the goal and purpose of § 392.530 RSMo. to apply them to a competitive telecommunications carrier such as Applicant.

13. IE Com, pursuant to § 386.570 RSMo. will comply with all orders and regulations of the commission applicable to providers of competitive interexchange telecommunications services, except those that are specifically waived by the commission pursuant to a request filed by Applicant.

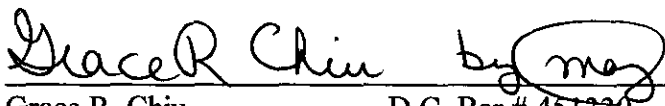
14. Applicant will not unjustly discriminate against customers; such discrimination is prohibited pursuant to § 392.200 RSMo.

WHEREFORE, International Exchange Communications, Inc. d/b/a IE Com requests that the Missouri Public Service Commission grant the requested Certificate of Service Authority, to provide resold interexchange telecommunications services in the State of Missouri, classify Applicant's proposed services as competitive, and grant a waiver of the statutes and regulations referenced above.

Respectfully submitted,



Mary Ann (Garr) Young Mo. Bar #27951
WILLIAM D. STEINMEIER, P.C.
P. O. Box 104595
Jefferson City, Missouri 65110-4595
Telephone: (573) 634-8109
Facsimile: (573) 634-8224



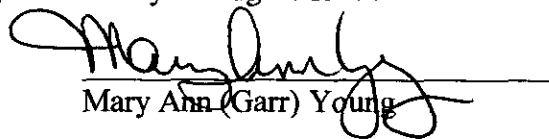
Grace R. Chiu D.C. Bar # 451330
Anandashankar Mazumdar D.C. Bar # 459902
SWIDLER BERLIN SHEREFF FRIEDMAN, LLP
3000 K St., N.W., Suite 300
Washington, D.C. 20007-5116
Telephone: (202) 424-7500
Facsimile: (202) 424-7645

Counsel for International Exchange Communications,
Inc. d/b/a IE Com

Dated: August 30, 1999

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Application has been sent this date to the General Counsel's Office and the Office of the Public Counsel by depositing same in the U.S. Mail, postage prepaid, or by hand delivery, this 30th day of August 1999.



Mary Ann (Garr) Young

EXHIBIT A

Certificate of Authority to Transact Business

STATE OF MISSOURI



Rebecca McDowell Cook
Secretary of State

CORPORATION DIVISION - CERTIFICATE OF AUTHORITY

WHEREAS,
INTERNATIONAL EXCHANGE COMMUNICATIONS, INC.

USING IN MISSOURI THE NAME
INTERNATIONAL EXCHANGE COMMUNICATIONS, 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 DELAWARE.

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 2ND DAY OF FEBRUARY, 1999.


Secretary of State



\$155.00

State of Missouri

Rebecca McDowell Cook, Secretary of State
P.O. Box 778, Jefferson City, Mo. 65102

Corporation Division

Application for Foreign Corporation For a Certificate of Authority

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

- (1) The corporation's name is INTERNATIONAL EXCHANGE COMMUNICATIONS, INC.
and it is organized and existing under the laws of DELAWARE
- (2) The name it will use in Missouri is INTERNATIONAL EXCHANGE COMMUNICATIONS, INC.
- (3) The date of its incorporation was 6/27/97, and the period of its duration is PERPETUAL
month/day/year
- (4) The address of its principal place of business 533 AIRPORT BLVD, SUITE 505, BURLINGAME CA 94010
Address City/State/Zip
- (5) The name and address of its registered agent and office in the State of Missouri is
HIQ CORPORATE SERVICES, INC.; 300-B EAST HIGH STREET, JEFFERSON CITY MO 65101
Name Address City/State/Zip
- (6) The specific purpose(s) of its business in Missouri are:
TO CONDUCT RETAIL TELECOMMUNICATIONS SERVICES

- (7) The name of its officers and directors and their business addresses are as follows:
- | (Officers) | Name | Address | City/State/Zip |
|------------|------|---------|----------------|
|------------|------|---------|----------------|

President SEE ATTACHED

Vice President _____

Secretary _____

Treasurer _____

(Board of Directors)

Director SEE ATTACHED

Director _____

Director _____

Director _____

FILED

AND CERTIFICATE OF
AUTHORITY ISSUED

FEB 02 1999

Rebecca McDowell Cook
SECRETARY OF STATE

- (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)

If affirmation thereof, the facts stated above are true.

Paul Ganton
(Authorized signature of officer or chairman of the board)

VP, Secretary
(Title)

1-29-99
(Date of Signature)

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.

INTERNATIONAL EXCHANGE COMMUNICATIONS, INC.

LIST OF OFFICERS & DIRECTORS

OFFICERS

Howard Neckowitz, President

644 Lakemead Way Redwood City CA 94062

**Gail Granton, VP, Secretary
& Treasurer**

50 Stockbridge Avenue Atherton CA 94027

DIRECTORS

Howard Neckowitz

644 Lakemead Way Redwood City CA 94062

Gail Granton

50 Stockbridge Avenue Atherton CA 94027

FILED
AND CERTIFICATE OF
AUTHORITY ISSUED

FEB 02 1999

Rebecca McDowell Cook
SECRETARY OF STATE



State of Missouri

No. X 353716

Rebecca McDowell Cook, Secretary of State

Corporation Division

Registration of Fictitious Name

(Submit in duplicate with a filing fee of \$7)

This information is for the use of the public and gives no protection to the name. There is no provision in this chapter to keep another company or corporation from adopting and using the same name. (RSMo 417)

We, the undersigned, are doing business under the following name, and at the following address:

Name to be registered: I E COM

Missouri Business Address: 533 AIRPORT BLVD, SUITE 505
(P.O. Boxes not accepted)

City, State and Zip Code: BURLINGAME CA 94010

The parties having an interest in the business, and the percentage they own are (if a corporation is owner, indicate corporation name and percentage owned). If all parties are jointly and severally liable, percentage of ownership need not be listed:

| Name of Owners, Individual or Corporate | Street and Number | City | State and Zip Code | If listed, Percentage of ownership must equal 100% |
|--|-------------------------|---------------|--------------------------|--|
| INTERNATIONAL EXCHANGE COMMUNICATIONS, INC. (F465524) | 533 AIRPORT BLVD, #505, | BURLINGAME CA | 94010 | 100% |
| | | | | |
| | | | | |
| | | | | |
| | | | | |
| | | | | |

Must be typed or printed)

Return to: Secretary of State
Corporation Division
P.O. Box 778
Jefferson City, Mo. 65102

(Over)

FILED

APR 13 1999

Rebecca McDowell Cook
SECRETARY OF STATE

The undersigned, being all the parties having interest in the above company, being duly sworn, upon their oaths each did say that the statements and matters set forth herein are true.

Individual
Owners
Sign Here

| | | |
|---|---|---|
| { | X | X |
| | X | X |
| | X | X |

The undersigned corporation has caused this application to be executed in its name by its President or Vice-President and its Secretary or Assistant Secretary, this 26th day of March, 1999.

If
Corporation
is
Owner,
Corporate
Officers
Execute
Here

INTERNATIONAL EXCHANGE COMMUNICATIONS, INC.

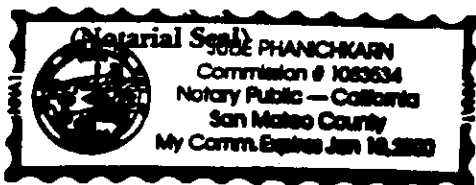
By [Signature] (Exact Corporate Title)
Its President or Vice-President
By [Signature]
Its Secretary or Assistant Secretary

(Corporate Seal)
If no seal, state "none".

State of California
County of San Mateo } ss

I, Julie Phanichkarn, A Notary Public, do hereby certify that on the 26th day of March, 1999, personally appeared before me Gail Granton, and being first duly sworn by me, acknowledged that S he signed as his own free act and deed the foregoing document in the capacity therein set forth and declared that the statements therein contained are true.

IN WITNESS WHEREOF, I have hereunto set my hand and seal the day and year before written.



[Signature]
Notary Public
My commission expires Jan. 18, 2000

VERIFICATION

STATE OF CALIFORNIA

SS:

COUNTY OF SAN MATEO

VERIFICATION

I, Gail E. Granton, being duly sworn, declare that I am the Vice President of International Exchange Communications, Inc. d/b/a IE Com, the Applicant in the subject proceeding; that I have read the foregoing application and exhibits; and that the same are true and correct to the best of my knowledge, information, or belief.

Gail Granton

Subscribed and sworn to before me

this 8th day of June, 1999

Notary Public

Julie Phanichkarn

My Commission Expires: Jan. 18, 2000

