NEWMAN, COMLEY & RUTH

ROBERT K. ANGSTEAD MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
MONROE BLUFF EXECUTIVE CENTER
601 MONROE STREET, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MISSOURI 65102-0537
www.ncrpc.com

November 19, 2003

TELEPHONE: (573) 634-2266 FACSIMILE: (573) 636-3306

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360 FILED NOV 1 9 2003

Missouri Public Service Commission

Re:

Advanced Telemanagement Group, Inc.

Case No. XA-2004-0161

Dear Judge Roberts:

Enclosed for filing in the referenced matter please find the original and five copies of a Motion for Leave to Amend Application. I also enclose for filing a First Amended Application, without the exhibits. I suggest that the Commission refer to the original application for reference to those exhibits.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Please contact me if you have any questions regarding this matter. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley comleym@ncrpc.com

MWC:ab Enclosure

cc: Office of Public Counsel

General Counsel's Office

Bob Maguire Judith A. Riley

FILED NOV 1 9 2003

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

		Service Commission
In the matter of the application of)	The Commission
Advanced Telemanagement Group, Inc. for a)	•
certificate of service authority to provide)	Case No. XA-2004-0161
interexchange and non-switched local)	
telecommunications services and for)	
competitive classification)	

MOTION FOR LEAVE TO AMEND APPLICATION

Comes now Advanced Telemanagement Group, Inc. (Applicant or "Advanced"), pursuant to 4 CSR 240-2.080(20) and for its motion for leave to amend application states as follows:

- 1. Applicant proposes to offer certain private line services and therefore needs certificate of service authority to offer and provide non-switched local service. The current application makes no official request for non-switched local service authority.
- 2. The first amended application (attached) differs from the initial application only in the respect that a request for non-switched local service authority has been added.
- 3. In its notice of applications and opportunity to intervene issued September 30, 2003, the Commission classified Advanced's request as one for interexchange <u>and</u> non-switched local exchange service authority. As a consequence, no revised notice is necessary.
- 4. This case is not contested. Staff is expected to recommend approval of the application and proposed tariffs shortly. Granting leave to amend would not delay the cause, or prejudice the parties; to the contrary, it would serve the interests of fairness and justice.

WHEREFORE, Applicant respectfully requests that the Missouri Public Service Commission grant its motion for leave to amend the application, and permit the filing of the attached First Amended Application.

Respectfully submitted,

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 Advanced Telemanagement Group, Inc.

Certificate of Service