

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

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

**NOV 21 2003**

**Missouri Public  
Service Commission**

In the matter of the Application of )  
American Farm Bureau, Inc. )  
d/b/a The Farm Bureau® Connection<sup>SM</sup> )  
for a certificate of service authority to ) Case No. CA-2004-0131  
provide Basic Local Telecommunications )  
Service in portions of the State of )  
Missouri and to classify said services and )  
the company as competitive. )

**MOTION TO AMEND BY INTERLINEATION**

COMES NOW American Farm Bureau, Inc. ("Applicant"), by its undersigned counsel, and  
for its Motion to Amend by Interlineation, states:

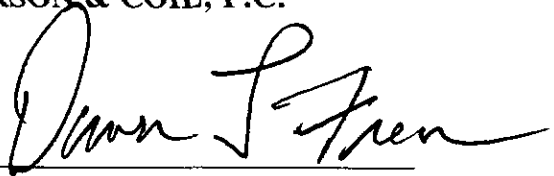
1. Applicant filed an Application on September 11, 2003 with the Missouri Public Service Commission seeking authority to provide basic resold and facilities-based local telecommunications service in portions of the State of Missouri and to classify said service and company as competitive.

2. The undersigned counsel was contacted by Tom Solt with the Public Service Commission requesting certain changes be made to the Application.

3. Therefore, attached hereto are the requested revisions to paragraphs 3, 8 and 9 to the Application filed with the Missouri Public Service Commission. Also attached are paragraphs 12 and 13 which have been added to the Application.

WHEREFORE, Applicant respectfully requests an order of this Commission substituting the revisions to paragraphs 3, 8 and 9 of the Application and adding paragraphs 12 and 13 of the Application filed with the Missouri Public Service Commission; and for such further relief as the Commission deems just and proper.

CARSON & COIL, P.C.

By: 

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**Attorneys for Applicant American Farm  
Bureau, Inc. d/b/a The Farm Bureau  
Connection**

**Certificate of Service**

The undersigned hereby certifies that a true and complete copy of the foregoing was sent this 21<sup>st</sup> day of November, 2003, by hand-delivery to the PSC's General Counsel's Office and the Office of Public Counsel.

  
Debra S. Dunnivant

All inquiries or communications regarding the ongoing operations of AFB should be addressed to:

Casey Wojciechowski, General Manager  
American Farm Bureau, Inc.  
225 Touhy Avenue  
Park Ridge, IL 60068  
Telephone: 847-685-8600  
Facsimile: 847-685-8680  
Toll Free: 800-362-3276

3. Applicant proposes to provide basic local exchange telecommunications service on a resold and facilities-based basis, using the unbundled network element platform (UNE-P), throughout all exchanges currently served by the incumbent local exchange telecommunication company(ies) of Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (SBC), formerly known as Southwestern Bell Telephone Company (SWBT), Sprint Missouri, Inc., CenturyTel of Missouri, LLC, and Spectra Communications Group, LLC. The specific exchanges within which AFB proposes to offer service are listed in the incumbent providers respective local exchange tariffs. Applicant may seek authority to provide this service in other areas of the state in a subsequent proceeding.

4. Pursuant to this application, Applicant seeks to offer and provide all forms of basic local telecommunications service to business, including: 1) Basic Exchange Services, including local exchange flat rate, measured rate service, pre-paid local exchange, operator services, etc; 2) Custom and Class Features, including call waiting, caller ID, call forwarding, etc.; 3) Ancillary Services such as 911, directory listing, and directory assistance.

5. Applicant possesses the technical and managerial expertise and experience necessary to provide the services it proposes. Description of backgrounds of Applicant's management, which demonstrate the extensive experience and expertise, are attached hereto and incorporated herein by reference as Exhibit B. Applicant also possesses the necessary financial resources. Financial statements are attached hereto as Exhibit C.

6. Applicant seeks classification of itself and its services as competitive.

7. Applicant will offer basic local telecommunications service as a separate and distinct service in accordance with applicable law. Applicant will give consideration to equitable access for all Missourians, regardless of where they might reside or their income, to affordable telecommunications services in Applicant's proposed service areas in accordance with applicable law.

8. Applicant is willing to comply with all applicable Commission rules and is willing to meet all relevant service standards, including, but not limited to billing, quality of service, and tariff filing and maintenance in a manner consistent with the Commission's requirements for incumbent local exchange carrier(s) with whom Applicant seeks authority to compete. Additionally, Applicant agrees that, its service area shall be no smaller than an exchange and Applicant will offer basic local telecommunications service as a separate and distinct service in accordance with applicable law. Consistent with the Commission's treatment of other certificated competitive local exchange telecommunications companies, Applicant requests that the following statutes and regulations be waived for Applicant, and its basic local exchange service offerings:

Statutes

392.210.2  
392.240 (1)  
392.270  
392.280  
392.290  
392.300.2  
392.310  
392.320  
392.330  
392.340

Missouri Public Service Commission Rules

4 CSR 240-3.545(2)(C)  
4 CSR 240-3.550(5)(C)  
4 CSR 240-10.020  
4 CSR 240-30.040  
4 CSR 240-33.030

9. Applicant further requests a temporary waiver of 4 CSR 240-3.510(1)(C). This rule requires that an application for a certificate of service authority to provide basic local exchange service shall include a proposed tariff with a forty-five day effective date. Applicant finds it impossible at this time to develop tariffs to fully comply with this rule since Applicant has not yet executed or received Commission approval of any interconnection and/or resale agreements with incumbent local exchange carrier(s). At such time as all facts necessary for the development of such tariffs are known to Applicant, it will promptly file said tariffs bearing no less than a 45 day effective date with the Commission in a manner consistent with the Commission's practice in similar cases. In any circumstance, applicant will file its proposed basic local exchange telecommunications service tariff no later than 30 days after Commission approval of applicant's interconnection and/or resale agreement.

10. Applicant submits that the public interest will be served by Commission approval of this application because Applicant's proposed services will create and enhance competition and expand customer service options consistent with the legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter 392 RSMo. Prompt approval of this application also will expand the availability of innovative, high quality, and reliable telecommunications services within the State of Missouri.

11. Applicant submits, notwithstanding the provisions of Section 392.500 RSMo. 2002, as a condition of certification and competitive classification, Applicant agrees that, unless otherwise ordered by the Commission, Applicant 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 whose service area(s) Applicant seeks authority 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 Applicant is operating decreases its originating and/or terminating access service 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 of its originating and/or terminating access rates in order to maintain the cap on switched exchange access rates.

12. Applicant herein states, in accordance with CSR 240-2.060(1)(K), that there are no pending actions or final unsatisfied judgments or decisions against Applicant in any state or 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.

13. Pursuant to 4 CSR 240-2.060(1)(L), Applicant hereby states that the Company does not have any overdue annual reports or assessment fees owed to the Missouri Public Service Commission.