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May 6, 1997

Mr. Cecil I. Wright
Executive Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re: American Communications Services, Inc. and Southwestern Bell Telephone Company
Interconnection Agreement

Dear Mr. Wright:

Please find enclosed for filing an original and fourteen copies of a Joint Application for Approval of the Interconnection Agreement between American Communications Services, Inc. ("ACSI") and Southwestern Bell Telephone Company ("SWBT") executed on May 2, 1997 and supporting affidavit of Charles H.N. Kallenbach, Vice President-Regulatory Affairs of ACSI. This Agreement was negotiated under the Telecommunications Act of 1996 (the Federal Act) in Missouri.

The Agreement, its Price List and Appendices are an integrated package and are the result of negotiation and compromise between competitors. There are no outstanding issues between the parties that need the assistance of mediation or arbitration.

ACSI and SWBT file this Agreement seeking Commission approval of its terms and conditions consistent with the Federal Act and Chapter 392 RSMo Supp. 1996. The implementation of this Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. ACSI and SWBT specifically request that the Commission refrain from taking any action to change, suspend or otherwise delay implementation of this Agreement, in keeping with the support for competition previously demonstrated by the Commission.

The Commission's prompt attention to this matter would be most appreciated.

Sincerely,

Brent Stewart
Brent Stewart

Enclosures

cc: Office of the Public Counsel

FILED
MAY 6 - 1997
MISSOURI
PUBLIC SERVICE COMMISSION

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

In the Matter of the Joint Application of)
American Communications Services, Inc.)
and Southwestern Bell Telephone)
Company for Approval of Interconnection)
Agreement Under the Telecommunications)
Act of 1996.)

Case No.

T0-97-487

JOINT APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT

Comes now American Communications Services, Inc. ("ACSI") and Southwestern Bell Telephone Company ("SWBT") and hereby file this Joint Application for Approval of Interconnection Agreement ("the Agreement") between ACSI and SWBT under the Telecommunications Act of 1996. In support of this Application, ACSI and SWBT respectfully state as follows:

I. INTERCONNECTION AGREEMENT REACHED

ACSI and SWBT present to this Commission for approval an Interconnection Agreement negotiated and executed pursuant to the terms of the Federal Act (Agreement, Attachment I). After weeks of intensive good faith negotiations to address all of the complex issues involved in such an agreement, ACSI and SWBT executed the Agreement on May 2, 1997. This Agreement contains 47 pages, a price list and 22 appendices. There are no outstanding issues between ACSI and SWBT that need the assistance of mediation or arbitration.

II. REQUEST FOR APPROVAL

ACSI and SWBT seek the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. The implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public

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interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, provides interconnectivity, and increases customer choices for telecommunications services after ACSI has effective tariffs approved pursuant to its certificate of service authority issued in Case No. TA-96-455 (issued March 19, 1997).

ACSI and SWBT respectfully request that the Commission grant expeditious approval of this Agreement, without change, suspension or other delay in its implementation. This is a bilateral agreement, reached as a result of negotiations and compromise between competitors, and the parties do not believe intervention by other parties is necessary or appropriate.

III. STANDARD FOR REVIEW

The statutory standards of review are set forth in Section 252(e) of the Federal Act which provides as follows:

Section 252(e) of the Federal Act:

(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 Commission 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; or

The affidavit of Charles H.N. Kallenbach, Vice-President--Regulatory Affairs for ACSI, establishes that the Agreement submitted herein satisfies these standards. (Affidavit, Attachment II).

IV. MISSOURI LEGISLATION

The negotiated and executed Agreement is consistent with the Missouri Legislation which became effective on August 28, 1996. After receiving approval of its tariffs, which will be filed pursuant to its certification in Case No. TA-46-455, ACSI will be allowed to provide the customer with increased choices.

V. CONCLUSION

For the reasons set forth above, ACSI and SWBT respectfully pray that the Commission approve the Agreement.

Respectfully submitted,

AMERICAN COMMUNICATIONS
SERVICES, INC.

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