LAW OFFICES

BRYDON, SWEARENGEN & ENGLAND

PROFESSIONAL CORPORATION

312 EAST CAPITOL AVENUE P.O. BOX 456

JEFFERSON CITY, MISSOURI 65 1 02-0456

TELEPHONE (573) 635-7166

FACSIMILE (573) 635-0427

E-MAIL: KARENBSE@AOL.COM

CHARLES E. SMARR DEAN L. COOPER MARK G. ANDERSON

TIMOTHY T. STEWART

GREGORY C. MITCHELL RACHEL M. CRAIG

BRIAN T. McCARTNEY

DALE T. SMITH

July 15, 1999

FILED

JUL 1 5 1999

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

Missouri Public Service Commission

Re:

DAVID V.G. BRYDON

GARY W. DUFFY

PAUL A. BOUDREAU

SONDA B. MORGAN

JAMES C. SWEARENGEN

WILLIAM R. ENGLAND, III

JOHNNY K. RICHARDSON

In the Matter of the Application of Fiber Four Corporation, d/b/a Iamo Long Distance for a certificate of service authority to provide interexchange authority to provide interexchange and local exchange telecommunications services.

Dear Mr. Roberts:

Enclosed please find the original plus fourteen (14) copies of Application, and Motion to Expedite Tariff Approval or to Grant Interim Authority and Approval for filing on behalf of Applicant in the above referenced matter. Please bring this matter to the attention of the appropriate Commission personnel. A copy of this filing is being sent to all parties of record.

Thank you for your attention to this matter.

Very truly yours,

BRYDON, SWEARENGEN & ENGLAND P.C.

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Jonelia Morgan Sondra B. Morgan

SBM/k

Enclosures

cc: Office of Public Counsel

Staff, Mo. Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

In the Matter of the Revised Tariff)	
Filing of Fiber Four Corporation)	
d/b/a Iamo Long Distance.)	Case No. 1A-2000-25

MOTION TO EXPEDITE APPLICATION AND TARIFF APPROVAL OR TO GRANT INTERIM AUTHORITY AND APPROVAL

Comes now Fiber Four Corporation d/b/a Iamo Long Distance ("Applicant" or "Iamo") and for its Motion to Expedite Application and Tariff Approval or to Grant Interim Authority and Approval states to the Missouri Public Service Commission ("Commission") as follows:

1. On June 25, 1999, Fiber Four Corporation ("Fiber Four") filed its tariff to implement long distance message telecommunications service ("LDMTS"). Fiber Four's tariff proposed a common set of terms and conditions for the provision of LDMTS and individual rate sheets for LDMTS depending upon the affiliated local exchange company ("LEC") in which LDMTS was to be provided. Fiber Four proposed to do business under four fictitious names including the fictitious name Iamo Long Distance. Although the Commission stamped the tariffs "received" on June 25, 1999, Counsel for Fiber Four was notified on June 28, 1999, that the tariff filing was being rejected because Fiber Four was proposing to do business using more than one fictitious name. Because time was of the essence, Fiber Four sought reinstatement of the tariff filing on July 2, 1999, requesting that the tariff be implemented for an interim period of time until Fiber Four could seek and obtain certificates for each of the fictitious names under which it proposed to do business. Counsel for Fiber Four has now been apprized by the Staff that this tariff will not be approved on an interim basis.

- 2. Accordingly, on this date Fiber Four Corporation d/b/a Iamo Long Distance is filing an Application for a certificate of service authority to provide interexchange telecommunications services and submitting a proposed tariff using only the d/b/a Iamo Long Distance. The tariffs submitted with this Application bear a forty-five day effective date of August 30, 1999. It is important that Iamo's Long Distance's toll tariff become effective on or before August 20, 1999, however, because Iamo Telephone Company is in the process of implementing its intraLATA dialing parity plan ("ILDP") as authorized by the Commission in Case NO. TO-99-509. Iamo Telephone Company's plan calls for the implementation of intraLATA dialing parity in the exchanges served by Iamo Telephone Company on August 20, 1999. Those customers who do not affirmatively select an intraLATA toll provider by August 20, 1999, will be assigned to Iamo Telephone Company's affiliated long distance company (i.e. Fiber Four) on this date.
- 3. Because of the delay occasioned by the rejection of the original tariff, Fiber Four now must request expedited approval of its application for a certificate of service authority to provide interexchange telecommunications service and expedited approval of its tariff for Fiber Four Corporation d/b/a Iamo Long Distance in order to be able to provide the service to the customers of Iamo Telephone Company when it implements ILDP.
- 4. If the Commission cannot approve the application for a certificate and the accompanying tariff in that time frame, Fiber Four requests that the Commission grant an interim certificate effective August 20, 1999, in order that it can provide toll service to the customers of Iamo Telephone Company.

Wherefore, Fiber Four respectfully requests that the Commission grant its Motion to Expedite Application and Tariff Approval or to Grant Interim Authority and Approval and for any other relief appropriate in the circumstances.

Respectfully submitted,

W. R. England, III

#23913

Sondra B. Morgan

#35482

BRYDON, SWEARENGEN & ENGLAND P.C.

P.O. Box 456

Jefferson City, MO 65102-0456

(573) 635-7166

Attorneys for Fiber Four Corporation d/b/a Iamo Long Distance

Certificate of Service

The undersigned hereby certifies that a true copy of the foregoing was hand delivered on July 15, 1999, to:

Office of Public Counsel Truman State Office Building Jefferson City, MO 65101 General Counsel Missouri Public Service Commission Truman State Office Building Jefferson City, MO 65101

Sondra B. Morgan