

LAW OFFICES
FRENCH & STEWART

RICHARD W. FRENCH
CHARLES BRENT STEWART

1001 Cherry Street
Suite 302
Columbia, Missouri 65201-7931

AREA CODE 573
TELEPHONE 499-0635
FACSIMILE 499-0638

WILLIAM M. SHANSEY
Of Counsel

May 13, 1997


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

Re: American Communications Services, Inc., Case No. TO-97-487

Dear Mr. Wright:

Please find enclosed for filing an original and fourteen conformed copies of a Motion for Expedited Consideration in the above referenced case, on behalf of American Communications Services, Inc.. Copies of same have been sent this date to the counsel for all parties of record. Thank you.

Sincerely,



Brent Stewart

CBS:wabk

Enclosure

cc: counsel for all parties of record

FILED
MAY 13 1997
MISSOURI
PUBLIC SERVICE COMMISSION

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

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

Case No. TO-97-487

FILED
MAY 13 1997
MISSOURI
PUBLIC SERVICE COMMISSION

MOTION FOR EXPEDITED CONSIDERATION

Comes now, American Communications Services, Inc. ("ACSI"), by and through counsel, and for its Motion For Expedited Consideration states as follows:

1. On June 28, 1996, ACSI's wholly-owned Missouri operating subsidiary, American Communications Services of Kansas City, Inc. ("ACSI-KC") filed its Application for a certificate of service authority to provide basic local telecommunications services in portions of the state of Missouri. On March 19, 1997 the Commission issued its Report and Order granting ACSI-KC's certificate.

2. After many months of good faith negotiations, on May 6, 1997, counsel for ACSI-KC first received and filed for Commission approval an executed Interconnection Agreement between ACSI and Southwestern Bell Telephone Company ("SWB"), which was executed by ACSI on behalf of its operating subsidiaries (see page 1, Interconnection Agreement). The application for approval of the Interconnection Agreement was filed jointly by ACSI and SWB in the format of all previously approved SWB interconnection agreements.

3. The ACSI/SWB Interconnection Agreement filed on May 6, 1997 also is virtually identical in all relevant terms and conditions to other SWB interconnection agreements which have previously been approved by the Commission and contains no new substantive terms, conditions, or even language differing from those interconnection agreements already

2.

approved by the Commission.

4. At about the same time ACSI filed its Missouri Interconnection Agreement, ACSI also executed and filed virtually identical state-specific interconnection agreements with SWB for ACSI's various state operating subsidiaries in those states served by SWB. In order to fulfill its business plan commitments and actual service provision deadlines, ACSI has asked for expedited approval of its agreements in Texas, Kansas and Oklahoma. Approval is expected in Texas on or before May 23, 1997 and in Kansas and Oklahoma on or before May 30, 1997.

5. In order to meet existing business plan commitments and service deadlines in Missouri, ACSI-KC needs to obtain approval of its Missouri Interconnection Agreement and tariffs (illustrative tariffs have been provided to the Staff) as close to May 30, 1997 as practically possible. Undue delays beyond this date not only will have the practical effect of delaying competitive entry into Missouri telecommunications markets, but will also threaten ACSI-KC's ability to fulfill its financial and marketing commitments to its Missouri customers.

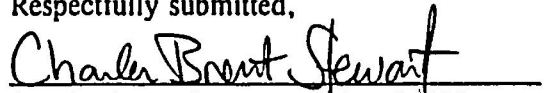
6. Given that the Commission already has approved virtually identical SWB interconnection agreements over the past few months, no party will be harmed by the Commission expediting its consideration of the ACSI/SWB Interconnection Agreement without further proceedings. As a practical matter, there should be no reason to prolong this proceeding by permitting an extended notice period, by scheduling evidentiary hearings, or by engaging in the type of review given earlier, first-impression interconnection agreements. While ACSI certainly is not suggesting that the Commission should forego its review of the Interconnection Agreement altogether, ACSI does suggest that the Commission's procedures

and review process should be flexible enough to accomodate the business realities of an emerging competitive market by doing all it can to encourage rapid entry into telecommunications markets. Expediting Commission consideration of the Interconnection Agreement (and ACSI-KC's tariffs which are intended to be filed within the next few days) will move Missouri forward toward the competitive market envisioned by the federal Telecommunications Act and Chapter 392 RSMo and would be consistent with the actions of other state commissions in SWB-served states.

7. The other party to the Interconnection Agreement and Joint Applicant, SWB, is not expected to oppose this request. While it did take more time to negotiate and finally execute the Interconnection Agreement than ACSI had hoped, once executed ACSI acted as swiftly as possible to make its required Interconnection Agreement filing with the Commission.

WHEREFORE, Applicant American Communications Services, Inc. respectfully requests that the Commission expedite its consideration of and approve the Joint Application for Approval of the ACSI/SWB Interconnection Agreement by May 30, 1997 or as soon thereafter as possible.

Respectfully submitted,

A handwritten signature in cursive script that reads "Charles Brent Stewart". The signature is written in dark ink and is positioned above a horizontal line.

Charles Brent Stewart, MoBar 34885
FRENCH & STEWART
1001 Cherry Street, Suite 302
Columbia, Missouri 65201
(573) 499-0635

ATTORNEY FOR APPLICANT
AMERICAN COMMUNICATIONS
SERVICES, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Motion was sent to counsel for all parties of record in Case No. TO-97-487 by depositing same in the United States Mail, first class postage prepaid, or by hand-delivery, this 13th day of May, 1997,

Charles Brent Stenick