

FILED

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION 1 1999
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of The Application of)
Allegiance Telecom, Inc. for Approval)
of an Interconnection Agreement with)
Southwestern Bell Telephone Company)
Pursuant to the Telecommunications Act of 1996.)

Case No. TO-2000-202

MOTION FOR EXPEDITED CONSIDERATION

Comes now Allegiance Telecom, Inc. ("Allegiance"), by and through local counsel, and in support of its Motion For Expedited Consideration respectfully states as follows:

1. Allegiance has this date filed with the Commission for approval Allegiance's Interconnection Agreement ("the Agreement") with Southwestern Bell Telephone Company ("SWBT").

2. The Agreement is virtually and in all material respects identical to, and is an adoption of, the Interconnection Agreement between SWBT and AT&T which was previously approved by the Commission as a result of Case Nos. TO-97-40 and TO-98-115. It also is virtually and in all material respect identical to other "AT&T opt in" interconnection agreements which have been recently approved by the Commission for other competitive basic local exchange telecommunications companies. As such, there should be no new substantive issues raised by the Agreement nor any need for a lengthy review of the Agreement by the Staff.

3. Allegiance recognizes that the Federal Telecommunications Act allows for a full ninety (90) day review period by state Commissions of interconnection agreements. However, for a variety of business reasons, Allegiance is most anxious to receive approval of its Interconnection Agreement with SWBT in Missouri as quickly as possible. Allegiance not only is attempting to meet an internal filing/approval deadline nationally for purposes of its corporate business plan, but

in addition, as a practical matter SWBT will not begin the actual technical interconnection discussions and processes with Allegiance until such time as Allegiance receives Commission approval of the Agreement. Given that the Agreement is no more than an "opt in" of a previously approved AT&T Interconnection Agreement, Allegiance is hopeful that the full ninety (90) day review process can be shortened and the case expedited.

4. Moreover, Allegiance has previously filed its basic local certificate application and that case is now pending as Case No. TA-2000-1. That case was filed on July 1, 1999 and should be submitted for Commission decision in the immediate future. Prompt Commission action on Allegiance's Interconnection Agreement will enable Allegiance to begin work on its proposed tariffs and help expedite Allegiance's tariff filing in Case No. TA-2000-1.

5. In an attempt to reduce the need for additional paperwork and subsequent filings in this case, Allegiance has filed the Agreement with the pages already numbered seriatim in the lower right hand corner of each page.

6. As this Motion is being filed concurrently with the Application For Approval of the Interconnection Agreement and a copy of both is being sent to counsel for SWBT and the Office of the Public Counsel, SWBT and the Office of the Public Counsel will have sufficient opportunity to respond to this Motion, if they so desire, prior to the time that the Commission would normally issue its first Order and Notice in this case.

WHEREFORE, for the reasons stated above, Allegiance Telecom, Inc. respectfully requests that the Commission expedite its review of Allegiance's Interconnection Agreement with SWBT and issue its Order approving the Agreement in less than ninety (90) days.

Respectfully Submitted,

Charles Brent Stewart

Charles Brent Stewart, MoBar #34885

STEWART & KEEVIL, L.L.C.

1001 Cherry Street, Suite 302

Columbia, Missouri 65201-7931

(573) 499-0635 (telephone)

(573) 499-0638 (facsimile)

Stewart499@aol.com (email)

**ATTORNEY FOR APPLICANT
ALLEGIANCE TELECOM, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent to counsel for Southwestern Bell Telephone Company, and the Office of the Public Counsel, by depositing same in the United States Mail, first-class postage prepaid, or by hand-delivery, this 1st day of SEPTEMBER, 1999.

Charles Brent Stewart