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July 14, 2003

FILED⁴

JUL 14 2003

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: **Case No.** _____
Application of Motion Telecom, Inc. for a Certificate of Service
Authority to Provide Interexchange Telecommunications Service

Dear Mr. Roberts:

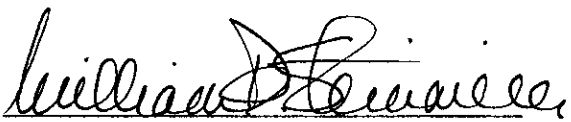
Enclosed for filing on behalf of Motion Telecom, Inc. please find an original and five (5) copies of a "**MOTION FOR EXPEDITED TREATMENT**" relating to the Application for Certificate of Service Authority filed simultaneously herewith.

Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By: 
William D. Steinmeier

Enclosures

cc: General Counsel
Office of Public Counsel
Barbara H. Vonderheid, Motion Telecom, Inc.
Mary Ann (Garr) Young

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

JUL 14 2003

**Missouri Public
Service Commission**

In the Matter of the Application of)
)
Motion Telecom, Inc.)
)
For Authority to Provide Intrastate, Interexchange)
Telecommunications Services in the State of Missouri)
And for Competitive Classification)

Case No. _____

MOTION FOR EXPEDITED TREATMENT

COMES NOW Motion Telecom, Inc. ("Motion Telecom" or "Applicant"), by its undersigned counsel, and pursuant to 4 CSR 240-2.080 (16), state the following to the Missouri Public Service Commission (the "Commission"):

1. The present Application is a companion to another application filed simultaneously, seeking Commission authority to transfer virtually all the assets of the Univance Telecommunications, Inc. to Motion Telecom, Inc. (the "Asset Transfer Application"). Expedited treatment is being sought, by separate motions in each case, of both this Application for Certificate of Service Authority, and the Asset Transfer Application.

2. As explained in the Asset Transfer Application, the bankruptcy of Univance Telecommunications, Inc. has rendered it unstable and unless the customer base is transferred promptly there is the risk that service quality will degrade or service will be interrupted to the detriment of the customers of Univance Telecommunications, Inc.

3. Applicant is requesting that the Commission grant expedited consideration of this Application and enter its order approving the same as soon as practically possible. The anticipated date for beginning the transfer of assets from Univance

Telecommunications, Inc. to Motion Telecommunications, Inc. is August 1, 2003, pending necessary regulatory approvals. Thus, Applicants, in the Asset Transfer Application in this matter, expressed its hope that the Commission could grant approval of the transfer of Missouri customers by August 28, 2003. Applicant recognizes and appreciates that this would be an extremely quick turnaround, but is trying to accomplish closing as soon as absolutely possible in order to avoid any degradation of service or service quality due to Univance's financial condition. In rendering its approval on an accelerated basis, the customers of Univance will not face the risk of poor quality of service, interruption or disconnection which might occur as a consequence of Univance's financial status.

4. To ensure a seamless transition and avoid customer confusion or inconvenience, written notification by letter was sent to the affected Univance customers at least thirty (30) days prior to the transfer, explaining the change in service provider in accordance with applicable FCC and state requirements for changing a customer's presubscribed carrier; a copy of that notification is attached to the Asset Transfer Application as **Exhibit B**.

5. There will be no negative effect on Univance's customers or the general public if the Commission grants all expedited relief sought herein as soon as practically possible.

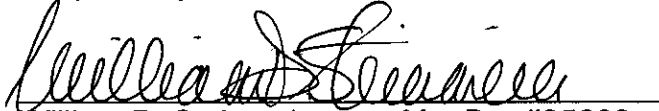
6. For these reasons, good cause exists for the expedited treatment of the Application.

7. This pleading was filed simultaneously with the application to which it relates, and therefore was filed as soon as it could have been filed. The transaction was approved by the Bankruptcy Court pursuant to an Order issued April 2, 2003, which is attached to the Asset Transfer Application as **Exhibit C**. The Section 363(b) Bankruptcy sale occurred on April 4, 2003. The large number of entities and jurisdictions involved in this transaction has made the legal logistics difficult to

accomplish more quickly. Application processes similar to those initiated here are also being undertaken in many other jurisdictions simultaneously.

8. WHEREFORE, Motion Telecom, Inc. respectfully requests the Commission to expedite its consideration of the application herein.

Respectfully submitted,



William D. Steinmeier Mo. Bar #25689

Mary Ann (Garr) Young Mo. Bar # 27951

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COUNSEL FOR MOTION TELECOM, INC.

Certificate of Service

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to the Office of the General Counsel of the Missouri Public Service Commission, and to the Office of Public Counsel, on this 14th day of July 2003.


William D. Steinmeier