

January 6, 2011

Stephen C. Reed
Secretary of the Commission
Missouri Public Svc Commission
200 Madison St
Jefferson City, MO 65101

RE: New Edge Network, Inc. – File No. XD-2011-0209

Mr. Reed:

In response to the above referenced Missouri Public Service Commission Staff motion filed on December 29, 2010, and pursuant to the Order Directing Notice issued on December 30, 2010, New Edge Network, Inc. (New Edge) responds as follows:

On December 24, 1999, in Case # TA-2000-311, New Edge was granted a certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri, subject to certain conditions set forth in the commission order.

1. That New Edge was granted a certificate of service authority to provide local exchange telecommunications services in the state of Missouri limited to providing dedicated, non-switched local exchange private line services, subject to all applicable statutes and Commission rules except as specified in the order, and;
2. That New Edge would be classified as a competitive telecommunications company.
3. In addition, certain statutes and regulatory rules were waived as part of the order and detailed therein.

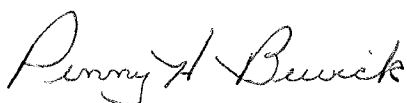
New Edge sought the authority granted by this Commission to enable the Company to provide the “interstate” managed data services to our customers in Missouri that we do today. The services that New Edge provides are “interstate” services and therefore New Edge has reported zero “intrastate” revenues in our annual compliance reporting.

To provide these "interstate" services, New Edge must obtain Unbundled Network Elements (UNEs) offered thru the incumbent local exchange carriers (ILEC) interconnection agreements. New Edge is collocated in several central offices in the CenturyLink and AT&T Missouri service territories under the terms of our interconnection agreements with these companies. In addition, New Edge purchases UNEs thru the interconnection agreements for the provision of underlying facilities out of these central offices for the provision of data services to our Missouri customers. The ILECs **require** competitive companies to obtain and maintain a certificate of authority in each state in order to enter into an interconnection agreement. This allows the New Edge to purchases UNEs and obtains collocation services. As a result, New Edge has maintained our compliance in the state of Missouri as detailed in our December 24, 1999 certificate of service.

New Edge respectfully requests that the Missouri Public Services Commission deny the Staff's motion and maintains the certificate of authority grant established in 1999. Cancellation of this certificate puts New Edge at risk of having AT&T and CenturyLink cancel our interconnection agreements and disconnect the associated services. This action would put the New Edge customers in the state of Missouri at risk of losing the services necessary to effectively operate their respective businesses. New Edge continues to commit to complying with all associated filings, fees and reports.

Should you have questions, or if I can provide further detail, please feel free to contact me at 360-906-9775 or by email at pbewick@newedgenetworks.com.

Thank you for your prompt consideration.



Penny H. Bewick

Vice President-External Affairs

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New Edge Networks is now EarthLink Business