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October 29, 2003

FILED

OCT 29 2003

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

Missouri Public
Service Commission

RE: Case No. _____
Application of New Access Communications LLC for Approval of Transfer
of Assets

Dear Mr. Roberts:

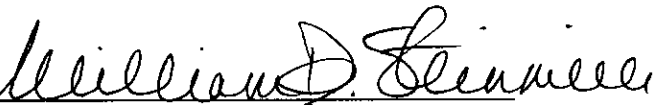
Enclosed for filing on behalf of New Access Communications LLC, please find an original and five (5) copies of a "**MOTION FOR EXPEDITED TREATMENT**" relating to the Application for Approval of Transfer of Assets filed simultaneously herewith.

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
Patrick D. Crocker
Mary Ann (Garr) Young

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

OCT 29 2003

In the Matter of the Application of)
)
New Access Communications LLC)
)
for Authority to Acquire Certain Assets of)
Ciera Network Systems, Inc.)

Missouri Public
Service Commission

Case No. _____

MOTION FOR EXPEDITED TREATMENT

COMES NOW New Access Communications LLC ("NAC"), by its undersigned counsel, and pursuant to 4 CSR 240-2.080 (16), states the following to the Missouri Public Service Commission (the "Commission"):

1. The present Application requests approval for NAC to acquire certain assets, including, but not limited to, the IXC subscriber base of Ciera Network Systems, Inc. ("Ciera"). Ciera and its senior lender, Textron Financial Corporation (collectively hereinafter, "Textron" or "Seller") have entered into a letter of intent for a voluntary foreclosure arrangement whereby certain Ciera assets will transfer to a specified assignee after a voluntary foreclosure from Ciera. The Application in this case is filed as a result of the execution of an Asset Purchase Agreement (the "Agreement") by NAC and Textron, pursuant to which NAC will acquire certain assets of Ciera and its subsidiaries in a private sale through the lender's foreclosure.

2. The benefit to be derived from expedited approval would be to allow the parties to consummate this transaction as soon as possible. Approval of the Asset Transfer Application in this matter by November 28, 2003 will allow NAC to promptly assume responsibility for the service of Ciera's existing customer base without interruption of

service or other inconveniences to consumers.

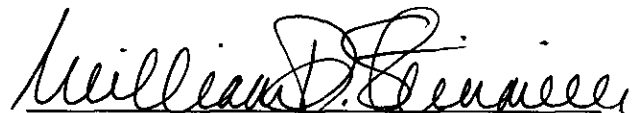
3. There will be no negative effect on Ciera's customers or the general public if the Commission grants expedited relief sought herein as soon as practically possible.

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

5. 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 transfer transaction is pursuant to an Asset Purchase Agreement just finalized between the Joint Applicants. Since a number of entities and jurisdictions are involved in this transaction, application processes similar to that initiated here are also being undertaken in many other jurisdictions simultaneously.

WHEREFORE, Applicant, New Access Communications LLC, respectfully requests the Commission to expedite its consideration of the Application herein. Approval of the Application is requested by November 28, or as soon thereafter as possible.

Respectfully submitted,



William D. Steinmeier, Mo. Bar #25689

Mary Ann (Garr) Young, Mo. Bar #27951

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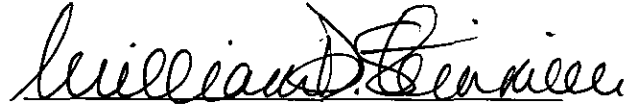
Email: pcrocker@earlylennon.com

ATTORNEYS FOR APPLICANT, NEW
ACCESS COMMUNICATIONS LLC

Dated: October 29, 2003

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 29th day of October, 2003.

A handwritten signature in cursive script, appearing to read "William D. Steinmeier", written over a horizontal line.

William D. Steinmeier