

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

**IN THE MATTER OF THE
APPLICATION OF NETWORK
PTS, INC. FOR APPROVAL
OF AN INTERCONNECTION
AGREEMENT UNDER THE TELE-
COMMUNICATIONS ACT OF 1996**

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Case No. _____

APPLICATION FOR APPROVAL OF AN INTERCONNECTION AGREEMENT

COMES NOW NETWORK PTS, INC. (“Network PTS” or “Applicant”) by its undersigned counsel, pursuant to 4 CSR 240-2.060 and 4 CSR 240-3.513(1) and hereby files its Application for Approval of an Interconnection Agreement between Applicant and Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri (“AT&T”) under the Telecommunications Act of 1996 (“1996 Act”). In support of this Application, Applicant states as follows:

I. PARTIES

Network PTS is a corporation duly organized and existing under and by virtue of the laws of the State of California and is duly authorized to conduct business in Missouri. Pursuant to relevant provisions of 4 CSR 240-2.060, a Certificate of Authority to transact business as a foreign entity is attached hereto and incorporated herein by reference as Appendix A. Applicant's principal place of business is 14472 Wicks Boulevard, San Leandro, California 94577. Applicant provides Competitive Local Exchange Carrier (“CLEC”) telecommunications services in the State of Missouri pursuant to a Certificate of Service Authority issued by the Missouri Public Service Commission (“Commission”) on November 20, 2006 in Case No. CA-2007-0147.

Applicant states, in accordance with 4 CSR 240-2.060(1)(k), that there are no pending actions or final unsatisfied judgments or decisions against Applicant in any state, federal agency or court which involve customer service or rates for which action, judgment or decision has occurred within three (3) years of the date of this Application.

Pursuant to 4 CSR 240 240-2.060(1) (L), Applicant states that the Company does not have any overdue annual reports or assessment fees owed to the Commission.

AT&T is a Texas limited partnership with its principal offices in Missouri located at One Bell Center (which may now be called One AT&T Center), Suite 4210, Saint Louis, Missouri 63101. AT&T Missouri, a subsidiary of SBC Communications, Inc., is an incumbent local exchange carrier (ILEC) in Missouri.

All communications, notices, orders and decisions respecting this Application and proceeding should be addressed to:

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And:

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II. INTERCONNECTION AGREEMENT REACHED

Applicant presents to this Commission for approval an Interconnection Agreement entered into between AT&T and Applicant, executed pursuant to the terms of the 1996 Act and submitted as an interconnection agreement arrived at through negotiation pursuant to 4 CSR 240-3.513(1). A copy of the Interconnection agreement is attached hereto as Appendix B. This agreement is a negotiated contract and is based upon the terms of the standard AT&T 13-STATE Interconnection Agreement that AT&T has entered into with other competitive telecommunications carriers. The Agreement was executed by Applicant on May 29, 2007 and by AT&T on June 4, 2007. There are no outstanding issues between Applicant and AT&T that need the assistance of mediation or arbitration.

III. REQUEST FOR APPROVAL

Applicant seeks the Commission's approval of the Agreement, consistent with the provisions of the 1996 Act and Missouri law. The implementation of this Agreement complies fully with Section 252(e) of the 1996 Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier.

IV. STANDARD OF REVIEW

The statutory standards of review are set forth in Section 252(e) of the 1996 Act which provides as follows:

(e) Approval by State Commission.

(1) Approval required. Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State Commission. A State Commission to

which an agreement is submitted shall approve or reject the agreement, with written findings as to any deficiencies.

(2) Grounds for rejection. The State may only reject:

(A) an agreement (or any portion thereof adopted by negotiation under subsection (a) if it finds that:

- (i) the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
- (ii) the implementation of such agreement or portion is not consistent with the public interest convenience, and necessity[.]

V. MISSOURI LAW

The executed Agreement is consistent with Missouri law.

VI. CONCLUSION

WHEREFORE, for the foregoing reasons, the Applicant respectfully requests that the Commission approve the Applicant's Interconnection Agreement with AT&T Missouri.

Respectfully submitted,

/s/ Mark W. Comley

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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 11th day of July, 2007, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

/s/ Mark W. Comley