

**HENDREN AND ANDRAE, L.L.C.**

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November 16, 1999

**FILED<sup>2</sup>**

NOV 16 1999

Missouri Public  
Service Commission

To 2000-331

Mr. Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: In the matter of the Application of Compass Telecommunications, Inc. For  
Approval of Interconnection Agreement Under The Telecommunications  
Act of 1996

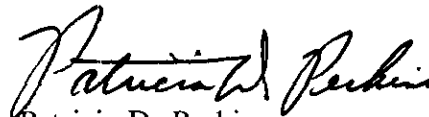
Dear Mr. Roberts:

Enclosed for filing is the original plus fourteen (14) copies of the Application of  
Compass Telecommunications, Inc. For Approval of Interconnection Agreement filed this  
date on behalf of Compass Telecommunications, Inc.

If you should have any questions concerning the enclosed filing, please do not  
hesitate to contact me. Thank you.

Very truly yours,

HENDREN AND ANDRAE, L.L.C.

  
Patricia D. Perkins

PDP: s

Enclosures

cc: Office of Public Counsel  
Joanne Beal  
Anthony K. Conroy

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>

NOV 16 1999

Missouri Public  
Service Commission

IN THE MATTER OF THE APPLICATION OF )  
COMPASS TELECOMMUNICATIONS, INC. )  
FOR APPROVAL OF INTERCONNECTION )  
AGREEMENT UNDER THE )  
TELECOMMUNICATIONS ACT OF 1996 )

Case No. To-2000-331

APPLICATION OF COMPASS TELECOMMUNICATIONS, INC. FOR APPROVAL  
OF INTERCONNECTION AGREEMENT UNDER THE  
TELECOMMUNICATIONS ACT OF 1996

Comes now Compass Telecommunications, Inc. ("Compass") and hereby files this Application for Approval of its Interconnection Agreement (the Agreement) under the Telecommunications Act of 1996 ("FTA 96") between Southwestern Bell Telephone Company (SWBT) and Compass, and respectfully states as follows:

**I. INTERCONNECTION AGREEMENT REACHED**

Compass presents to this Commission for approval the Agreement executed pursuant to the terms of Section 252(i) of the Act. Compass and SWBT have executed the Agreement between Compass and SWBT on September 20, 1999, and October 26, 1999, respectively. The Agreement consists of thirty-eight (38) pages plus Exhibits and Appendices. There are no outstanding issues between Compass and SWBT which require mediation or arbitration.

**II. REQUEST FOR APPROVAL**

Compass seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act and Missouri law. Compass believes that the implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against

any telecommunications carrier. The Agreement promotes diversity in providers, provides interconnectivity, and increases customer choices for telecommunications services once Compass is certificated and has effective tariffs.

Compass respectfully requests that the Commission grant expeditious approval of the Agreement, without change, suspension or other delay in its implementation. This is a bilateral agreement, reached as a result of negotiations and compromise between the parties.

### **III. STANDARD FOR REVIEW**

In addition to the applicable terms of Section 252(i), the statutory standards of review are set forth in Section 252(e) of the Federal 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 commission 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.

The affidavit of Patricia D. Perkins, local counsel for Compass Operating Corp., establishes that the Agreement submitted herein satisfies these standards. (Affidavit Attachment 1).

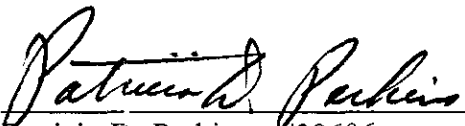
#### **IV. MISSOURI LEGISLATION**

The executed Agreement is consistent with Chapter 392 RSMo and is fundamentally an adoption of Interconnection Agreements previously approved by the Commission.

#### **V. CONCLUSION**

WHEREFORE, Compass respectfully requests that the Commission approve the Interconnection Agreement between SWBT and Compass as expeditiously as possible.

Respectfully submitted,



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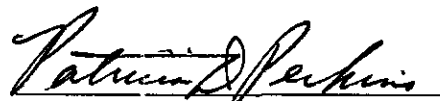
Patricia D. Perkins, #29606  
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ATTORNEYS FOR  
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ATTACHMENT I

VERIFICATION OF APPLICATION

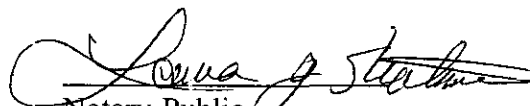
I, Patricia D. Perkins, Attorney for Compass Telecommunications, Inc. and pursuant to 4 CSR 240-2.060(f), hereby swear and affirm that I am authorized to speak on behalf of the Applicant Compass Telecommunications, Inc. and to attest to the veracity of the statements contained in this Application.

  
Patricia D. Perkins

STATE OF MISSOURI    )  
                                  ) ss  
COUNTY OF COLE    )

I, Laura J. Stratman, a Notary Public, do hereby certify that on this 15 day of November, 1999, personally appeared before me Patricia D. Perkins, who declared that all of the information contained herein above is true, to the best of her knowledge and belief.



  
Notary Public

My Commission Expires: 9-13-2003