

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

In the Matter of the Application of)	
PEG Bandwidth IL, LLC , for)	
Certificate of Service Authority to Provide)	
Basic Local Exchange, Non-Switched Local)	Case No. LA-2015-0162
Exchange and Interexchange)	
Telecommunications Services in the)	
State of Missouri and to Classify Said)	
Services and the Company as Competitive)	

APPLICATION

COMES NOW PEG Bandwidth IL, LLC ("Applicant" or "PEG"), by its undersigned counsel, pursuant to sections 392.361, 392.410, 392.420, 392.430, 392.440 and 392.450 RSMo., the Federal Telecommunications Act of 1996, 4 CSR 240-2.060 and 4 CSR 240-3.510, and files this verified Application requesting that the Missouri Public Service Commission (hereinafter, "the Commission") issue an order that:

- (a) grants Applicant certificate of service authority to provide basic local exchange, non-switched local exchange and interexchange telecommunications services, pursuant to Chapter 392 RSMo;
- (b) grants competitive status to Applicant and Applicant's requested services; and
- (c) waives certain Commission rules and statutory provisions pursuant to Sections 392.420, 392.361 and 392.245.5(8), RSMo, consistent with the Commission's past treatment of other certificated providers of competitive telecommunications services.

In support of its Application, PEG states as follows:

1. PEG Bandwidth IL, LLC is a limited liability company duly organized and existing under and by virtue of the laws of the State of Delaware, and is duly authorized to conduct business in Missouri. The nature of Applicant's business is telecommunications.

Applicant's principal place of business is:

PEG Bandwidth IL, LLC
3 Bala Plaza East, Suite 502
Bala Cynwyd, PA 19004
Tel: (610) 660-4910
Fax: (610) 660-4920

Pursuant to 4 CSR 240-2.060(1)(C), a Certificate of Registration to transact business in Missouri, issued by the Missouri Secretary of State, is attached hereto as **Exhibit A.**

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

William D. Steinmeier
William D. Steinmeier, P.C.
2031 Tower Drive
Jefferson City, Missouri 65109
Tel: (573) 659-8672
Fax: (573) 636-2305
Email: wds@wdspsc.com

Patrick D. Crocker
Crocker & Crocker
The Kalamazoo Building
107 W. Michigan Avenue, 4th Floor
Kalamazoo, Michigan 49007-4752
Tel: (269) 381-8893
Fax: (269) 381-4855
Email: patrick@crockerlawfirm.com

3. Questions concerning Applicant's ongoing operations should be directed to Mr. Crocker at the above address and phone number. Questions regarding Applicant's proposed tariff should be directed to Mr. Steinmeier.

4. By this Application, PEG requests a certificate of service authority to provide competitive basic local exchange services to business customers throughout all exchanges in the state of Missouri of all incumbent local exchange companies (ILECs). The

exchanges in which PEG seeks authority are listed in the approved tariffs of the ILECs, and will be listed in Applicant's basic local service tariff, which will be posted on the Company's website. PEG's proposed service areas will follow the respective exchange boundaries of each incumbent LEC and shall be no smaller than an exchange as required by Section 392.455(3) RSMo.

5. Applicant seeks authority to provide private dedicated lines to providers of wireless telecommunication services as well as other carriers and enterprise customers on an individual case basis. For wireless and other carrier customers Applicant will provide high-capacity fiber connections from the edge of the carrier's network to an existing geographic core fiber infrastructure. Applicant will then aggregate backhaul traffic across multiple networks providing a seamless end to end solution to wireless carrier customers thereby expanding the competitive telecommunications infrastructure in the State of Missouri. By this Application, the Company seeks a Certificate of Service Authority authorizing it to build such infrastructure and to provide facilities-based interexchange and local and competitive access intrastate telecommunications services to carriers and to large customers within the State of Missouri. The proposed services will include fiber optic capacity on a wholesale basis to such telecommunications carriers - such as IXC's, ILECs, CLECs, wireless service providers, international carriers, ISPs and other large users. Applicant will provide transport capacity to enable its customers to meet the growing demand for reliable, high-bandwidth voice and data transmission capacity.

As market demand and company business plans permit, Applicant may in the future provide additional fiber-based services.

6. By this Application, PEG also requests a certificate of service authority to provide competitive intrastate interexchange and non-switched local exchange (dedicated private line) telecommunications services throughout the state of Missouri. PEG's interexchange and non-switched local exchange tariff will be posted on the Company's website.

7. Applicant possesses the technical and managerial expertise and experience necessary to provide the services it proposes as required by Section 392.455(1), RSMo. Information concerning Applicant's principal management employees and their qualifications is attached hereto and incorporated herein as **Exhibit B**.

8. Applicant possesses the necessary financial resources and abilities to provide the services it proposes as required by Section 392.455(1), RSMo and has the necessary capital to conduct its proposed operations in Missouri. Attached to this Application as **Appendix C** is the affidavit of a corporate officer attesting to the resources and abilities of Applicant.

9. PEG seeks classification of itself and its services as competitive, with accompanying reduced regulation pursuant to Section 392.361 and 392.245.5(8), RSMo and 4 CSR 240-3.510(1)(A). Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation and that granting this request will allow greater price and service options for telephone users.

10. PEG will offer basic local telecommunications services as a separate and distinct service in accordance with applicable law. PEG will give consideration to equitable access for all Missourians, regardless of where they might reside or their income, to affordable telecommunications services in PEG's proposed service areas in accordance

with applicable law.

11. Applicant is willing to, and will, comply with all applicable Commission rules. Consistent with the Commission's treatment of other certificated competitive local exchange telecommunications companies, Applicant requests that the Commission grant Staff's recommended waivers of statutes and regulations.

12. Applicant acknowledges 4 CSR 240-3.510(1)(C), which requires that a tariff and any applicable interconnection agreements must be filed with the Commission and approved before service can be provided. Applicant will file a proposed access services tariff with a forty-five (45) day effective date as soon as possible following the filing of this Application. Applicant will post its basic local, non-switched local exchange and interexchange services tariff on its website as soon as the application is approved.

13. Applicant submits that the public interest will be served by Commission approval of this Application because Applicant's proposed service will create and enhance competition and expand customer service options, consistent with the legislative goals set forth in the Telecommunications Act of 1996 and Chapter 392, RSMo. Prompt approval of this Application also will expand the availability of innovative, high quality and reliable telecommunications services within the State of Missouri.

14. Applicant has no pending or final judgments or decisions against it from any state or federal agency or court that involves customer rates or service.

15. Applicant has no annual report or assessment fees that are overdue.

WHEREFORE, Applicant, PEG Bandwidth IL, LLC, respectfully requests that the Commission grant it certificate of service authority to provide basic local exchange, non-switched local exchange and interexchange telecommunications services as herein requested, classify Applicant and Applicant's proposed services as competitive, grant the waivers of statutes and regulations recommended by Staff and approve the tariff to be filed in this matter.

Respectfully submitted,

/s/ William D. Steinmeier

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ATTORNEY FOR APPLICANT
PEG Bandwidth IL, LLC

Dated: January 12, 2015

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been served electronically on the Office of Public Counsel at opcservice@ded.mo.gov, and on the Staff Counsel's office at staffcounselerservice@psc.mo.gov, this 12th day of January 2015.

/s/ William D. Steinmeier

William D. Steinmeier

VERIFICATION

(Filed as a separate pdf document)

PEG Bandwidth IL, LLC

EXHIBIT A

Certificate of Registration
from
Missouri Secretary of State

(Filed as a separate pdf document)

PEG Bandwidth IL, LLC

EXHIBIT B

Profiles of Key Management Employees

(To be late-filed.)

PEG Bandwidth IL, LLC

EXHIBIT C

Officer's Financial Affidavit

(To be late-filed.)