

FILED⁴

JUN 04 2003

Missouri Public
Service Commission

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

**In Re: The Master Interconnection and)
Resale Agreement By and Between)
Sprint Missouri, Inc., and ICG Telecom)
Group, Inc. Pursuant to Sections 251 and 252)
of the Telecommunications Act of 1996)**

Case No. _____

**APPLICATION OF SPRINT MISSOURI, INC. FOR APPROVAL OF MASTER
INTERCONNECTION AND RESALE AGREEMENT AND AMENDMENT**

COMES NOW, Sprint Missouri, Inc, d/b/a Sprint (hereinafter "Sprint") and hereby files its Application for Approval of a Master Interconnection and Resale Agreement and Amendment No. 1 to the Agreement between Sprint Missouri, Inc. d/b/a Sprint and ICG Telecom Group. Inc. pursuant to the Telecommunications Act of 1996 (the Federal Act). In support of its application, Sprint states as follows:

I. APPLICANT

Sprint is a Missouri corporation with offices at 319 Madison, Jefferson City, Missouri 65102. Sprint is authorized to transact business within the State of Missouri and is authorized by the Missouri Public Service Commission ("Commission") to provide basic local and interexchange telecommunications service within the state.

Sprint was originally incorporated in Missouri in 1929 as The United Telephone Company. A restatement of its certification was received in Case No. TA-88-87. Sprint has received all necessary Commission and Secretary of State's Office approvals for subsequent name changes and is a corporation in good standing in the State of Missouri.

Evidence of proper name registrations was most recently provided to this Commission in Case No. TO-97-53 (Re: United Telephone Company of Missouri's Adoption Notice Designed to Change the Company's Name to United Telephone Company of Missouri d/b/a Sprint) and Case No. TO-98-107 (Application of United Telephone Company of Missouri d/b/a Sprint for Approval of Name Change to Sprint Missouri, Inc.). Sprint requests that the information in those cases be incorporated herein by reference. To Sprint's knowledge there are no overdue assessments or annual reports nor are there any pending actions or final unsatisfied judgments or decisions against it involving customer service or rates occurring within the last three years.

II. MASTER INTERCONNECTION AND RESALE AGREEMENT

Sprint presents to the Missouri Public Service Commission (Commission) its application pursuant to the terms of the Federal Act. The parties entered into a Master Interconnection and Resale Agreement (the Agreement) dated May 1, 2002 between Sprint Missouri, Inc., a Missouri corporation, and ICG Telecom Group, Inc (Attachment A). Amendment No. 1, dated May 12, 2003, amends section 66.2.1 of the Agreement (Attachment B). There are no outstanding issues related to the Agreement or Amendment No. 1 between the parties which require the assistance of mediation or arbitration.

III. STANDARD FOR REVIEW

The statutory standard of review under Section 252(e) of the Act states:

- (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 to shall approve or reject the agreement, with written findings as to any deficiencies.

- (2) under subsection (a) if it finds Grounds for Rejection.
The State commission may only reject.
 - (A) an agreement (or any portion thereof) adopted by negotiation 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; or...

Applicant further states that the Agreement and Amendment No. 1 are consistent with the public interest, convenience and necessity in that it allows for full and fair competition and greater choice for the consumer. The Applicant further states that the Agreement and Amendment No. 1 do not discriminate against other carriers not a party to the Agreement as the terms of the Agreement are equally available to any other carrier.

IV. REQUEST FOR APPROVAL

Sprint seeks the Commission's approval of the Agreement and Amendment No. 1, consistent with the provisions of the Federal Act. Both parties believe 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.

Sprint and ICG Telecom Group, Inc. respectfully request that the Commission grant approval of the Agreement and Amendment No. 1, without change, suspension or other delay in its implementation.

V. MISSOURI LEGISLATION

The negotiated and executed Agreement and Amendment No. 1 are consistent with the Missouri Legislation, Senate Bill No. 507, which became effective on August 28, 1996.

VI. CONCLUSION

WHEREFORE, for the foregoing reasons, Applicant prays that the Commission approve the Master Interconnection and Resale Agreement and Amendment No. 1 between Sprint Missouri, Inc., and ICG Telecom Group, Inc.

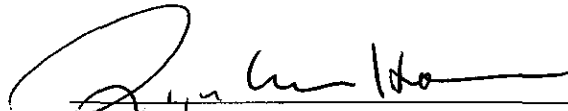
Respectfully submitted,



Lisa Creighton Hendricks - MO Bar #42194
6450 Sprint Parkway
MS: KSOPHN0212-2A253
Overland Park, Kansas 66251
Voice: 913-315-9363
Fax: 913-523-9829
Lisa.c.creightonhendricks@mail.sprint.com

VERIFICATION

I, Lisa Creighton Hendricks, an attorney and duly authorized representative of Sprint Missouri, Inc. hereby verify and affirm that I have read the foregoing Application of Sprint Missouri, Inc., d/b/a Sprint For Approval of a Master Interconnection and Resale Agreement and Amendment No. 1, and that the statements contained therein are true and correct to the best of my information and belief.

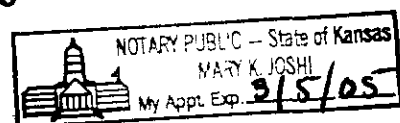


Lisa Creighton Hendricks

Subscribed and sworn to before me on this 3rd day of June, 2003.


Notary Public

My Commission Expires: 3/5/05



CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 4th day of June, 2003, a copy of the above and foregoing and any attachments were served by U.S. Mail, postage prepaid and or email or facsimile to each of the following:

Office of the Public Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101

Cheryl Hills
Senior Director & Counsel
ICG Telecom Group, Inc.
180 Grand Avenue, Suite 450
Oakland, California 94612

Office of the General Counsel
Missouri Public Service Commission
200 Madison Street
Jefferson City, MO 65101



Lisa Creighton Hendricks