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November 15, 2002

VIA FEDERAL EXPRESS

Dale Roberts
Chief Regulatory Law Judge/Secretary
Missouri Public Service Commission
200 Madison St., Suite 100
P.O. Box 360
Jefferson City, MO 65102

**RE: APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY
TO PROVIDE INTEREXCHANGE TELECOMMUNICATIONS
SERVICES**

Dear Mr. Roberts:


Enclosed in this package please find an original and eight (8) complete copies of an Application for Application for Certificate of Service Authority to Provide Interexchange Telecommunications Services.

Also enclosed is an additional photocopy of the Application. Please date-stamp the photocopy and return it to us in the enclosed self-addressed stamped envelope.

We would greatly appreciate expedited consideration.

Thank you for your attention herein. Please contact me with any and all questions or comments so that I may discuss them with you and my client to facilitate the Application's approval.

Very truly yours,



David W. Gearhart

DWG/pg
Enclosure

cc: Office of Public Counsel (w/ encl.)
General Counsel (w/ encl.)

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

In the matter of the application of St. Anthony's)
Medical Center, Inc. for a certificate of service)
authority to provide interexchange)
telecommunications services)

Case No: _____

**APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY
TO PROVIDE INTEREXCHANGE TELECOMMUNICATIONS SERVICES**

COMES NOW St. Anthony's Medical Center ("Applicant"), a not-for-profit Missouri corporation, by and through its undersigned counsel, and, in conjunction with its Application for Certificate of Authority to provide Shared Tenant Services in the State of Missouri (filed concurrently herewith), files this verified Application for Certificate of Service Authority to Provide Interexchange Telecommunications Services. In support of its request, Applicant states as follows:

1. Applicant is a not-for-profit corporation duly organized and existing under and by virtue of the laws of the State of Missouri. A Certificate of Corporate Good Standing from the Missouri Secretary of State's Office is attached hereto as Exhibit 1. Applicants legal name and principal place of business are:

St. Anthony's Medical Center
10010 Kennerly Rd.
St. Louis, MO 63128

2. The name and address of Applicant's in-state attorney is:

David W. Gearhart
Lewis, Rice & Fingersh, L.C.
500 N. Broadway, Suite 2000
St. Louis, MO 63102

3. There are no pending actions or final judgments or decisions against Applicant from any state or federal agency or court which involves customer services or rates, which

actions, judgments or decisions have occurred within three years of the date of this Application. Applicant confirms that no annual report or assessment fees are overdue.

4. Applicant proposes to provide interexchange telecommunications services within Missouri on a resold basis, including Operator assisted, direct dial ("1+"), and 800 services. Applicant proposes to provide its services only to the tenants of the buildings in one location identified in Applicant's Application for Certificate of Service Authority to Provide Shared Tenant Services with State of Missouri (filed concurrently herewith). Said services will be provided through the resale of services of other approved and tariffed carriers. Operator services will be offered by the underlying carrier.

5. Applicant requests a temporary waiver of 4 CSR § 240.2.060(6)(C). Applicant has not yet developed its tariff to fully comply with this rule. At such time as all facts necessary for the development of such tariff are known to Applicant, it will promptly file such tariff bearing no less than a 45-day effective date with the Commission in a manner consistent with the Commission's practice in similar cases. No other utility should be affected by such a waiver.

6. Applicant requests classification as a competitive telecommunications company within the State of Missouri. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation.

7. Granting of this application will be in the public interest because it will create greater competition in the interexchange market place and will allow greater price and service options for telephone users in the state consistent with the legislative goals set forth in the Federal Telecommunications Act of 1996 and Chapter § 392 R.S.Mo.

8. Applicant also requests, pursuant to § 392.420, RSMo., that the Commission waive the application of the following rules and statutory provisions as it relates to the regulation of Applicant:

- | | |
|-------------------------|---|
| 392.210.2 | Uniform System of Accounts. |
| 392.240(1) | Rates-reasonable average return on investment. |
| 392.270 | Property valuation. |
| 392.280 | Depreciation rates. |
| 392.290 | Issuance of stocks and bonds. |
| 392.300.2 | Acquisition of Stock |
| 392.310 | Issuance of stocks and bonds. |
| 392.320 | Issuance of stocks and bonds. |
| 392.330 | Issuance of stocks and bonds. |
| 392.340 | Reorganization. |
| | |
| 4 CSR 240-10.020 | Income on Depreciation Fund Investments. |
| 4 CSR 240-30.010 (2)(C) | Posting Exchange Rates at Central Offices. |
| 4 CSR 240-30.040 | Uniform System of Accounts. |
| 4 CSR 240-32.030 (1-4) | Records and Reports. |
| 4 CSR 240-32.040 (1-7) | Metering, Inspections and Tests. |
| 4 CSR 240-32.050 (1-6) | Customer Service. |
| 4 CSR 240-32.060 (1-16) | Engineering and Maintenance. |
| 4 CSR 240-32.070 (1-6) | Quality of Service. |
| 4 CSR 240-32.080 (1-5) | Service Objections and Surveillance Levels. |
| 4 CSR 240-32.090 (1-2) | Correction of Equipment and Inside Wiring of the
Telecommunications Network. |
| 4 CSR 240-32.100 (1-6) | Provision of Basic Local and Interexchange Telecommunications
Service. |
| 4 CSR 240-32.120 (1-6) | Snap-Back Requirements for Basic Local Telecommunications
Companies. |
| 4 CSR 240-33.030 | Inform customers of lowest priced service. |

Applicant requests the additional waiver of 4 CSR § 240-2.060(6)(c). Upon information and belief, the above-referenced rules and statutory provisions have been waived to other interexchange carriers in prior cases. With respect to the requested waivers from the Rules from Chapter 32, 4 CSR 240-32.010(1) specifically provides that the Rules comprising Chapter 32 shall not apply to private Shared Tenant Service providers.

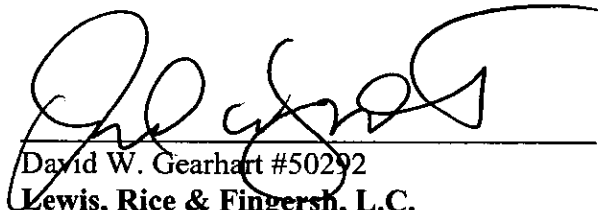
9. Applicant, pursuant to § 386.570, R.S.Mo., will comply with all applicable Commission rules except those which are specifically waived by the Commission pursuant to the request filed by Applicant.

10. All correspondence or communications pertaining to this Application should be addressed to:

David W. Gearhart
Lewis, Rice & Fingersh, L.C.
500 N. Broadway
Suite 2000
St. Louis, Missouri 63102
(314) 963-1776

WHEREFORE, Applicant respectfully requests that the Missouri Public Service Commission grant it a certificate of service authority to provide interexchange telecommunications services within the State of Missouri. Applicant also requests a competitive classification. In addition, Applicant requests a waiver of the above-referenced rules and statutory provisions.

Respectfully submitted,



David W. Gearhart #50292
Lewis, Rice & Fingersh, L.C.
500 N. Broadway, Suite 2000
St. Louis, Missouri 63102

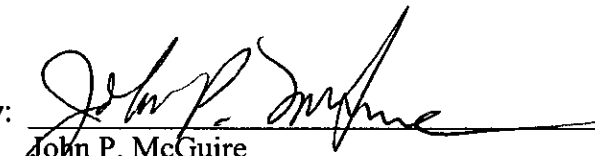
(314) 444-7600
(314) 612-7786 (Facsimile)

Attorney for Applicant St. Anthony's
Medical Center

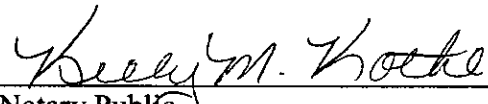
STATE OF MISSOURI)
) SS
COUNTY OF ST. LOUIS)

The undersigned, being duly sworn upon his oath, deposes and states that he is the EXECUTIVE VICE PRESIDENT for St. Anthony's Medical Center and the facts and matters stated in the foregoing Application for a Certificate of Service Authority to Provide Interexchange Telecommunications Services are true and correct to the best of his knowledge, information and belief.

ST. ANTHONY'S MEDICAL CENTER

By: 
John P. McGuire
Executive Vice President &
Chief Financial Officer

Subscribed and sworn to before me this 15 day of November, 2002.


Notary Public




KELLY M. KOTHE
Notary Public - State of Missouri
County of Jefferson
My Commission Expires Aug 13, 2003

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed U.S. postage prepaid this 15th day of November, 2002 to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson, MO 65102

A handwritten signature in black ink, appearing to read "J. R. Smith", is written over a horizontal line.

No. N00011551

STATE OF MISSOURI



Matt Blunt
Secretary of State

CORPORATION DIVISION


CERTIFICATE OF CORPORATE GOOD STANDING

I, MATT BLUNT, Secretary of State of the State of Missouri,
do hereby certify that the records in my office and in my
care and custody reveal that

ST. ANTHONY'S MEDICAL CENTER

was incorporated under the laws of this State on the 23rd
day of JULY, 1971, and is in good standing, having fully
complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my
hand and imprinted the GREAT SEAL of
the State of Missouri, on this, the
14th day of NOVEMBER, 2002.


Secretary of State

