

**BEFORE THE
MISSOURI PUBLIC SERVICE COMMISSION**

Application of)	
Startec Global Operating Company)	
For a Certificate of Service Authority)	
to Provide Intrastate Interexchange)	Case No. TA-2007-0366
Telecommunications Services)	
In the State of Missouri, for)	
Competitive Classification, and)	
For Approval of Tariff Adoption)	

MOTION FOR EXPEDITED TREATMENT

COMES NOW Startec Global Operating Company (“Startec” or “Applicant”), by and through undersigned counsel, for its Motion for Expedited Treatment pursuant to 4 CSR 240-2.080(16), hereby states:

1. On March 29, 2007 Applicant filed an Application for certification of Startec to provide intrastate interexchange telecommunications services in Missouri, and related requests (the “Application”). The filing of the Application is one step arising out of the *pro forma* merger of Startec and Startec Global Licensing Company (“SGLC”).
2. The merger, as explained in the Application, has already occurred, and as such, Startec requires authority to provide interexchange telecommunications services to SGLC’s customers in Missouri, consistent with the grant of other required approvals. Startec regrets not realizing earlier that Missouri PSC approval was required for this transaction, and apologizes to the Commission for its oversight.

3. Applicant respectfully requests the Commission to issue an Order approving the Application to be come effective as soon as possible, but *no later than May 6, 2007 (effective no later than May 16, 2007)*.

4. Pursuant to 4 CSR 240-2.080 (16) (C), Startec states that this motion for expedited treatment is being filed as soon as it could have been, upon recognition of the need for Missouri PSC approval, and is being filed concurrently with the application for a certificate of service authority herein and an application for approval of the underlying merger of SGOC and SCLC.

5. By granting the certificate requested in this Application, the Commission will be taking steps to (1) ensure that *pro forma* restructuring will be virtually transparent to SGLC's former customers; and (2) allow Startec to remain a strong competitor in the telecommunications market, thus assuring that the benefits of competition generated by SGLC's presence will not be lost to consumers.

6. Failure to approve this Application in an expeditious manner will harm the public interest. Not only would failure to approve the Application result in the inability of customers to continue to receive their "Startec" services, it would also result in the diminution of competition in Missouri.

7. Further, absent Commission approval, Startec and its corporate parent, SGCC, will be unable to timely consummate a transfer of control of SGCC and its subsidiaries, including Startec, to new investors, and thus provide Startec increase financial viability

through new ownership by that merger.¹ Startec anticipates that this transaction will allow Startec and its purchaser's affiliated telecommunications carriers to realize significant cost savings and operational benefits. Such savings may result from network integration, lower international termination costs as a result of larger traffic volumes, synergies from information systems integration, and other sources. These cost savings and benefits will cause Startec to become a stronger competitor in the marketplace and will allow it to continue to provide high quality and low cost telecommunications services to hundreds of Missouri residents. Moreover, the transaction will also put Startec in a better position to expand its service offerings, to the ultimate benefit of its customers. Delay in the regulatory approval process will prevent the parties from realizing these economic and operational benefits or delivering expanded customer services as quickly as the parties otherwise would.

8. Given that, absent Commission approval, Startec would not hold authorization necessary to provide service to SGLC's former customers, Applicant requests expedited treatment of this Application. Expedient consideration and grant of the Application is therefore an important step towards maintaining continuity of service for Startec's customers.

¹ SGCC and EnergyTRACS Acquisition Corp. ("EnergyTRACS") entered into an Agreement and Plan of Merger dated March 5, 2007 that will result in EnergyTRACS becoming affiliated Startec. A notification concerning the proposed transfer of control is being filed separately.

WHEREFORE, for all the reasons stated herein, the Applicants respectfully request that the Commission grant this Motion for Expedited Treatment and issue its order granting the relief requested in the Application *no later than May 6, 2007 (effective no later than May 16, 2007)*.

Respectfully submitted,

/s/ William D. Steinmeier

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Company

Dated: March 29, 2007

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document has been served electronically on the General Counsel's Office and the Office of the Public Counsel this 29th day of March 2007.

/s/ William D. Steinmeier

William D. Steinmeier