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September 14, 1999

JEFFERSON CITY, MISSOURI 65102-0537

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SEP 1 4 1999

Missouri Public Service Commission

ROBERT K. ANGSTEAD ROBERT J. BRUNDAGE MARK W. COMLEY CATHLEEN A. MARTIN STEPHEN G. NEWMAN JOHN A. RUTH

> The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

Nextlink Missouri, Inc.

Interconnection Agreement with Southwestern Bell Telephone Company

Case No. TO-2000-143

Dear Judge Roberts:

Enclosed for filing in the referenced matter please find the original and fourteen copies of a Motion for Expedited Consideration.

Thank you very much.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley

MWC:ab Enclosure

cc:

Office of Public Counsel

Carol Pomponio Katherine C. Swaller

FILED<sup>3</sup>
SEP 1 4 1999

## BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI

Missouri Public Service Commission

Application of NEXTLINK MISSOURI, INC. ) for Approval of Interconnection Agreement Under the Telecommunications Act of 1996.

Case No. TO-2000-143

## MOTION FOR EXPEDITED CONSIDERATION

Comes now NEXTLINK MISSOURI, INC. (NEXTLINK) and moves for expedited treatment and consideration of the interconnection agreement submitted herein for Commission approval. In support, the NEXTLINK respectfully states the following to the Commission:

- 1. On August 12, 1999, NEXTLINK filed its application for approval of the interconnection agreement it had reached with Southwestern Bell Telephone Company (SWBT) and in due course, the Commission made SWBT a party to this action.
- 2. The parties had intended to file an interconnection agreement that was identical in all respects, except for NEXTLINK's name change and certain recitals, to the AT&T-SWBT interconnection agreement previously approved by the Commission. However, the interconnection agreement that was filed with the Commission was in fact not identical, and as a consequence, on September 3, 1999, NEXTLINK filed a complete substitution of the interconnection agreement noting the revisions.
- 3. NEXTLINK's interconnection agreement with SWBT in this case is identical to the interconnection agreement between SWBT and AT&T. Since the interconnection agreement under review in the instant case is identical to one which this Commission has already scrutinized in great detail, the parties submit that analysis can be shortened dramatically and approval issued quickly.
  - 4. Moreover, NEXTLINK's market launch is scheduled for November 1,1999.

Expeditious approval of this agreement is critical to successful market entry in that there are specific terms and conditions contained in the proposed agreement, including specific unbundled elements, which are not available to NEXTLINK under its current agreement and which have become, due to extenuating circumstances, essential to NEXTLINK's ability to become operational. NEXTLINK's market entry would be benefitted if the Commission were to accelerate its review and evaluation of the interconnection agreement.

- 5. Accordingly, NEXTLINK respectfully requests that the Commission expedite its consideration of this matter so that an order approving the interconnection agreement can be entered and become effective on or before September 30, 1999.
  - 6. SWBT has no objection to the relief requested in this motion.
  - 7. This application is unopposed. No party has sought to intervene.
  - 8. Approval of the application on an expedited basis will serve the public interest.

WHEREFORE, NEXTLINK respectfully requests the Commission to give this application expedited treatment and enter an order approving the interconnection agreement effective September 30, 1999 and other relief the Commission deems fit and just.

Respectfully submitted,

By: ,

Mark W. Comley

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Attorneys for NEXTLINK MISSOURI, INC.

## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, on this 14<sup>th</sup> day of September, 1999, to:

Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Katherine C. Swaller Attorney at Law

One Bell Center, Room 3536

St. Louis, MO 63/10-1976

Mark W. Comley