BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of TCG St. Louis)		
for Approval of an Interconnection Agreement)	Case No	
Under the Telecommunications Act of 1996.)		

TCG ST. LOUIS' APPLICATION FOR APPROVAL OF AN INTERCONNECTION AGREEMENT

TCG St. Louis, pursuant to Section 252(e) of the Telecommunications Act of 1996 (the "Act") and 4 CSR 240-3.513(1), respectfully submits its Application for Approval of an Interconnection and/or Resale Agreement by and between TCG St. Louis and AT&T Missouri, ¹ and requests the Missouri Public Service Commission ("Commission") approve this Agreement.

In support of this Application, TCG St. Louis states:

1. TCG St. Louis is a New York partnership with its principal office at One AT&T Way, Bedminster, New Jersey, 07921. It may be contacted at the electronic mail address, facsimile and telephone numbers of its attorneys, as set out under the signature block of this Application. TCG St. Louis is authorized to do business in Missouri. TCG St. Louis is a "local exchange telecommunications company" and a "public utility," and is duly authorized to provide "telecommunications service" within the State of Missouri, as each of those phrases is defined in Section 386.020, RSMo. 2000.

¹ Southwestern Bell Telephone Company, d/b/a AT&T Missouri, will be referred to in this pleading as "AT&T Missouri"

² TCG St. Louis filed a copy of its partnership agreement with the Commission in Case No. TA-96-345.

2. All correspondence, pleadings, orders, decisions, and communications regarding this proceeding should be sent to:

Timothy P. Leahy Leo J. Bub Robert J. Gryzmala Attorneys for TCG St. Louis, Inc. One AT&T Center, Suite 3520 St. Louis, Missouri 63101

- 3. TCG St. Louis has no unsatisfied final judgments or decisions against it from any state or federal agency or court, which involves retail customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application. TCG St. Louis currently has one pending action involving customer service or rates.³
- 4. TCG St. Louis does not have any annual report or assessment fees that are overdue.
- 5. TCG St. Louis seeks approval of this Interconnection Agreement pursuant to Section 252(e)(1) of the Telecommunications Act of 1996 ("the Act"). The Commission must approve the Interconnection Agreement unless it determines that the Interconnection Agreement (or any portion thereof): (1) discriminates against a telecommunications carrier not a party to the agreement and/or amendment; or (2) the implementation of such agreement and/or amendment is not consistent with the public interest, convenience, and necessity.⁴
- 6. TCG St. Louis states that the Interconnection Agreement does not discriminate against a telecommunications carrier not a party to the Interconnection

2

³ Sage Telecom, Inc. v. AT&T Corp., et al., Mo. U.S. Dist. Ct. Case No. 4:05CV587FRB.

⁴ See Section 252(e)(2) of the Act.

Agreement. TCG St. Louis further states that the implementation of the Interconnection Agreement is consistent with the public interest, convenience, and necessity.

WHEREFORE, TCG St. Louis respectfully requests that the Commission approve the Interconnection and/or Resale Agreement between TCG St. Louis and AT&T Missouri.

Respectfully submitted,

TCG ST. LOUIS, INC.

TIMOTHY P. LEAHY

TIMOTHY P. LEAHY #36197 LEO J. BUB #34326 ROBERT J. GRYZMALA #32454

Attorneys for TCG St. Louis One AT&T Center, Room 3518

St. Louis, Missouri 63101

314-235-2508 (Telephone)/314-247-0014(Facsimile)

leo.bub@att.com

COUNTY OF COLE)	
)	SS
STATE OF MISSOURI)	

VERIFICATION

I, Timothy M. Judge, first being duly sworn, state on my oath that I am over the age of twenty-one years, sound of mind, and Director-Regulatory of Southwestern Bell TelephoneCompany, d/b/a AT&T Missouri ("AT&T Missouri"). I am authorized to act on behalf of AT&T Missouri regarding the foregoing document. I have read the foregoing document and I am informed and believe that the matters contained therein are true.

Timothy M. Judge

On this 16th day of October 2007, before me, a Notary Public, personally appeared Timothy M. Judge, and being first duly sworn upon his oath stated that he is over twenty-one years, sound of mind and Director-Regulatory of AT&T Missouri, he signed the foregoing document as Director-Regulatory of AT&T Missouri and the facts contained therein are true and correct according to the best of his information, knowledge and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal in the County and State aforesaid, the day and year above-written.

Notary Public

My Commission Expires: June 28, 2008

TAMMY R. MORRIS
Notary Public - Notary Seal
STATE OF MISSOURI
Cole County
My Commission Expires: June 28, 2008

CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail on October 16, 2007.

Leo J. Bub

General Counsel
Kevin Thompson
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
kevin.thompson@psc.mo.gov

Public Counsel
Michael F. Dandino
Office Of The Public Counsel
P.O. Box 7800
Jefferson City, MO 65102
opcservice@ded.mo.gov
mike.dandino@ded.mo.gov