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January 25, 2008

VIA OVERNIGHT DELIVERY

Ms. Colleen Dale
Chief ALJ and Executive Secretary
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, MO 65102

Re: Wholesale Carrier Services, Inc. – LOCAL EXCHANGE

Dear Ms. Dale:

I hereby seek to appear in Wholesale Carrier Services, Inc.'s Application for Certificate of Service Authority to Provide Local Telecommunications Services Within the State of Missouri.

Enclosed please find an original and eight (8) copies of the Acknowledgement Receipt of \$100.00 as required by Rule 6.01(m) for myself from the Clerk of the Supreme Court along with the Application for Certificate of Service Authority to Provide Local Telecommunications Services Within the State of Missouri and Motion for Protective Order for information that is "highly confidential".

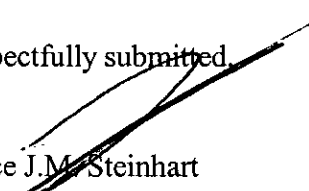
Applicant's financial information, which contains confidential and proprietary information, is being filed in a separate envelope, containing **one copy of the confidential information in redacted form marked "Confidential and Proprietary Information"** and **eight (8) copies of the intact confidential information marked "Confidential and Proprietary Information"**.

Please send notification of the filing of this application to lsteinhart@telecomcounsel.com. I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Please note that this Application is being submitted by myself and Judith A. Rau, Esq., Missouri Counsel, Bar # 24856.

Respectfully submitted,


Lance J.M. Steinhart
GA Bar No. 678222
Attorney for Wholesale Carrier Services, Inc.

Enclosures

cc: Chris S. Barton
Michael Dandino, Office of Public Counsel
General Counsel, Missouri Public Service Commission

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

In the matter of the application)
of Wholesale Carrier Services, Inc.)
for a certificate of service authority to) Case No.
provide resold and facilities-based/UNE)
Basic Local Telecommunications Services)
in Portions of the State of Missouri and)
to Classify Such Services and the Company)
as Competitive)

APPLICATION

Wholesale Carrier Services, Inc. ("Applicant" or "WCS"), a Florida Corporation, files this verified application respectfully requesting that the Missouri Public Service Commission ("Commission") issue an order that:

- (a) grants Applicant a Certificate of Service Authority to provide resold and facilities-based/UNE Basic Local Telecommunications Services in Portions of the State of Missouri pursuant to Sections 392.455 and 392.420 -.44055 of the Revised Statutes of Missouri (RSMo) 1994 and Sections 392.410 and .450, RSMo Supp. 1996.
- (b) grants competitive status to Applicant pursuant to Section 392.361 RSMo Supp 1996., and classifies the Applicant's services as competitive.
- (c) waives certain Commission rules and statutory provisions pursuant to Section 392.420, RSMo Cumm. Supp. 1996.

In support of its request, Applicant states:

1. The legal name and principal office or place of business of the Applicant are:

Wholesale Carrier Services, Inc.

5471 N. University Drive

Coral Springs, Florida 33067

(954) 227-1700 (Phone)

(561) 750-7244 (Fax)

A copy of Applicant's Articles of Incorporation, and certificate of authority from the Missouri Secretary of State to transact business in Missouri are attached hereto as Exhibit I.

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

Judith A. Rau, Esq.

Rau & Rau

119 E. Mill Street

Waterloo, Illinois 62298

3 . Applicant proposes to provide resold and facilities-based/UNE basic local telecommunications service as a separate and distinct service within portions of the State of Missouri. Applicant is willing to comply with all applicable Commission rules and is willing to meet all relevant service standards, including, but not limited to, billing, quality of service and tariff filing and maintenance. Applicant proposes to provide services to prospective customers in exchanges currently served by Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri; Embarq Missouri, Inc. d/b/a Embarq; CenturyTel of Missouri, LLC d/b/a CenturyTel; and Spectra Communications Group, LLC d/b/a CenturyTel, as set forth in the list of exchanges attached hereto as Exhibit II. Applicant will give consideration to equitable access for all Missourians, regardless of where they might reside or their income, to affordable telecommunications services in the proposed service area as set forth in Exhibit II, in accordance with applicable law.

When it initiates service in Missouri, Wholesale Carrier Services, Inc., (WCS) proposes to offer resold local exchange services and local services utilizing unbundled network elements, or the equivalents thereof, obtained through commercial and/or interconnection agreements. Such services will be provided by utilizing the facilities of incumbent local exchange carriers ("LECs"). Initially, the services WCS intends to offer are likely to be those local exchange telecommunications services offered by incumbent local exchange carriers in the proposed service area. WCS intends to provide local exchange services that may include but are not limited to the following:

- * Basic Residential Exchange Services
- * Residential Custom and Class Features (call waiting, caller ID, call forwarding, call blocking, speed calling, etc.)
- * Basic Business Exchange Services
- * Business Customer Calling and Class Features
- * Adjunct Provided Features (voice messaging, etc.)
- * Business and Residential Ancillary Services (911, E911, 411, Relay Service, directory listing, directory assistance, etc.)
- * Centrex
- * DSL and ISDN
- * DID Trunks and Lines
- * Private Lines

WCS does not initially intend to install any switching equipment for the provision of local exchange service in the State of Missouri.

4. Applicant has the experience in the telecommunications

industry and the technical and financial resources to provide telecommunications services within Missouri. A brief description of the qualifications and experience of the key management employees is attached hereto as Exhibit III, along with a description of the Applicant's telecommunications background. A copy of the financial information to demonstrate Applicant's financial ability to provide service, Exhibit IV, contains confidential and proprietary information, and is being submitted under separate cover.

Applicant is currently authorized to provide long distance service in Alabama, Arizona, Arkansas, California, Colorado, Connecticut, Delaware, District of Columbia, Florida, Georgia, Idaho, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Montana, Nevada, New Hampshire, New Jersey, New Mexico, New York, North Carolina, North Dakota, Ohio, Oklahoma, Oregon, Pennsylvania, Rhode Island, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, Washington, West Virginia, Wisconsin and Wyoming (For Missouri See Case No. TA-2002-1117). Applicant is also authorized to provide local exchange service in Alabama, Colorado, Florida, Georgia, Illinois, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Montana, Nebraska, Nevada, New York, North Carolina, Pennsylvania, South Carolina, Vermont and West Virginia. Applicant is in the process of applying for authorization to provide competitive local exchange services in approximately 20 additional states. Applicant has not been denied authority for any of the services for which it seeks authority in this Application.

5. Applicant hereby respectfully requests a temporary waiver of 4 CSR 240-3.510 (1) (C) that requires Applicant to file a draft tariff simultaneously with this application until Applicant has executed interconnection agreements with the incumbent LECs and those agreements have been approved by the Commission. Applicant will file its tariff with an effective date of at least 45 days after filing.

6. Applicant hereby respectfully requests classification as a competitive telecommunications company within the State of Missouri and receive a lesser degree of regulation as permitted by Sections 392.361 and 392.420 RSMo. Applicant also requests that its services be classified as competitive. Applicant believes that its proposed services will be subject to sufficient competition to justify a lesser degree of regulation. Granting of this application will allow greater price and service options for telephone users.

7. Applicant also respectfully requests, pursuant to Section 392.420 RSMo (Cum. Supp. 1992), that the Commission waive the application of the following rules and statutory provisions as it relates to the regulation of Applicant:

Statutes

392.210.2 Establish Uniform System of Accounts for Annual reports

392.240(1) Setting just and reasonable rates

392.270 Ascertain Property values

392.280 Establish Depreciation accounts

392.290 Issuance of securities

392.300.2 Acquisition of stock

392.310 Issuance of stock and debt

392.320 Stock Dividend Payment

392.330 Issuance of securities, debts and notes

392.340 Reorganization(s)

Commission Rules

4 CSR 240-10.020 Depreciation fund income

4 CSR 240-3.550(5)C) File Exchange boundary maps with Commission

4 CSR 240-30.040 Uniform System of Accounts

The above-referenced rules and statutory provisions have been waived to other carriers in prior cases.

8. Applicant, pursuant to Section 386.570, Cum. Supp. 1992, will comply with all applicable Commission rules except those which are specifically waived by the Commission pursuant to a request filed by the Applicant.

9. All inquiries, correspondence, communications, pleadings, notices, orders and decisions relating to this case shall be addressed to:

Lance J.M. Steinhart

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Suite 115

Alpharetta, Georgia 30005

(770) 232-9200

(770) 232-9208 (Fax)

lsteinhart@telecomcounsel.com (Email)

10. The Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application. No Commission annual reports or assessment fees are overdue.


11. WCS submits the following arguments to demonstrate that the public interest will be served by the approval of this Application:

The grant of a certificate to provide competitive basic local telecommunications services to the Applicant will serve the public interest. The Applicant's presence in the market will expand customer choice for telecommunications service. The increased competition brought by the Applicant to the market will have the effect of improving the quality of telecommunications services in Missouri and decreasing the cost of such services through increased innovation and efficiency. The result will be beneficial to economic development in Missouri. The granting of a certificate to the Applicant will contribute to the availability of reasonably affordable local exchange services in the State of Missouri.

12. WCS submits, notwithstanding the provisions of Section 392.500 RSMo., as a condition of certification and competitive classification, WCS agrees that, unless otherwise ordered by the Commission, WCS originating and terminating switched exchange access rates will be no greater than the lowest Commission-approved corresponding access rates in effect for each ILEC within those service area(s) WCS seeks authority to provide service. Additionally, pursuant to the Commission's Report and Order in Case No. TO-99-596, WCS agrees that if the ILEC in whose service area WCS is operating decreases its originating and/or terminating access service rates, WCS shall file an appropriate tariff amendment to reduce its originating and/or terminating access rates within thirty (30) days of the ILEC's reduction of its originating and/or terminating access rates in order to maintain the cap on switched exchange access rates.


WHEREFORE, Applicant, Wholesale Carrier Services, Inc., respectfully requests that the Missouri Public Service Commission grant it a certificate of service authority to provide resold and facilities-based/UNE Basic Local Telecommunications Services within portions of the State of Missouri. Applicant also respectfully requests classification as a competitive telecommunications company and requests that its services be classified as competitive. In addition, Applicant respectfully requests a waiver of the above-referenced rules and statutory provisions and a temporary waiver of the tariff filing requirement.

Respectfully submitted,



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and



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Attorneys for Applicant