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December 7, 1999

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

**FILED<sup>2</sup>**

DEC 7 1999

Re: Trans National Telecommunications, Inc.

Missouri Public  
Service Commission

Dear Judge Roberts:

TO-2000-360

Please find enclosed for filing in the referenced matter an original and fourteen copies of a Application for Approval of Interconnection Agreement under the Telecommunications Act of 1996. I enclose the original and five copies of the Resale Agreement, which is marked as Attachment 1.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

  
Mark W. Comley  
comleym@ncrpc.com

MWC:ab

Enclosure

cc: Office of Public Counsel  
Monique Byrnes

BEFORE THE PUBLIC SERVICE COMMISSION  
STATE OF MISSOURI

FILED<sup>2</sup>  
DEC 7 1999

Missouri Public  
Service Commission

Application of TRANS NATIONAL )  
TELECOMMUNICATIONS, INC. )  
for Approval of Interconnection Agreement )  
Under the Telecommunications Act of 1996. )

Case No. TC-2000-360

APPLICATION FOR  
APPROVAL OF INTERCONNECTION AGREEMENT  
UNDER THE TELECOMMUNICATIONS ACT OF 1996

Comes now TRANS NATIONAL TELECOMMUNICATIONS, INC. (hereinafter "TNT", or "Applicant") and hereby files this Application for Approval of a Resale Agreement (the Agreement) between Southwestern Bell Telephone Company (SWBT) and TNT under the Telecommunications Act of 1996 (the Federal Act) and Chapter 392, RSMo 1994 as amended, and respectfully show the Missouri Public Service Commission (the Commission) the following:

**I. THE APPLICANT**

TNT is a corporation duly organized and existing under and by virtue of the laws of the State of Texas and is duly authorized to do business in Missouri. It is presently in the process of obtaining certificate of service authority from the Commission to offer and provide local exchange and basic local exchange services. Its application for such a certificate is pending before this Commission and has been docketed as Case No. TA-2000-359. TNT attached to its application in that case a series of certificates related to its corporate authority to transact business in this state and in Texas. TNT directs the Commission to the application in Case No. TA-2000-359 for further information, if needed, about the company and its capacity.

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## **II. INTERCONNECTION/RESALE AGREEMENT REACHED**

TNT presents to this Commission for approval a Resale Agreement negotiated and executed pursuant to the terms of the Federal Act (Agreement, Attachment 1). This Agreement was entered into pursuant to Section 252(a)(1) of the Federal Act, and SWBT and TNT executed the Agreement effective September , 1999. The Agreement contains 38 pages, together with several Attachments and Appendices. There are no outstanding issues between SWBT and TNT that need the assistance of mediation or arbitration.

## **III. DESIGNATED CONTACTS**

The designated contacts for purposes of this Application are:

Mark W. Comley  
NEWMAN, COMLEY & RUTH P.C.  
601 Monroe Street, Suite 301  
Jefferson City, MO 65101  
Telephone: 573 634-2266  
Fax: 573 636-3306  
e-mail – comleym@ncrpc.com

and

Monique Byrnes  
TECHNOLOGIES MANAGEMENT, INC.  
210 Park Avenue North  
Winter Park, FL 32789  
(407) 740-8575  
(407) 740-0613 FAX

## **IV. REQUEST FOR APPROVAL**

TNT seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. The implementation of this Agreement complies fully with Section 252(e) of the Federal Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier. The Agreement promotes diversity in providers, and increases customer choices for telecommunications services.

TNT respectfully requests that the Commission grant expeditious approval of this Agreement, without change, suspension or other delay in its implementation. This is a bilateral agreement, reached as a result of negotiations and compromise between competitors, and intervention by other parties is neither necessary nor appropriate.

## **V. STANDARD OF REVIEW**

The statutory standards of review are set forth in Section 252(e) of the Federal Act which provides as follows:

### **(e) APPROVAL BY STATE COMMISSION**

- (1) APPROVAL REQUIRED.**--Any interconnection agreement adopted by negotiation or arbitration shall be submitted for approval to the State commission. A State commission to which an agreement is submitted to shall approve or reject the agreement, with written findings as to any deficiencies.
- (2) GROUNDS FOR REJECTION.**--The State Commission may only reject --
  - (A)** an agreement (or any portion thereof) adopted by negotiation under subsection (a) if it finds that --
    - (i)** the agreement (or portion thereof) discriminates against a telecommunications carrier not a party to the agreement; or
    - (ii)** the implementation of such agreement or portion is not consistent with the public interest, convenience, and necessity;

## **VI. MISSOURI LEGISLATION**

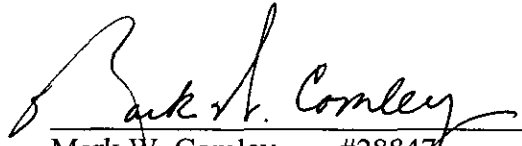
The negotiated and executed Agreement is consistent with Chapter 392, RSMo 1994 as amended by S.B. 507 of the Missouri Laws of 1996 and effective August 28, 1996.

## **VII. CONCLUSION**

For the reasons set forth above, TNT respectfully prays that the Commission approve the Agreement expeditiously.

Respectfully submitted,

By:

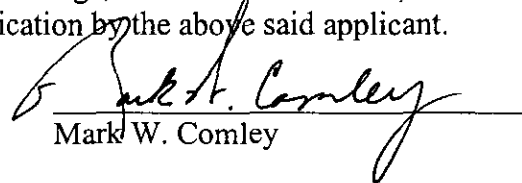


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Attorneys for TRANS NATIONAL  
TELECOMMUNICATIONS, INC.  
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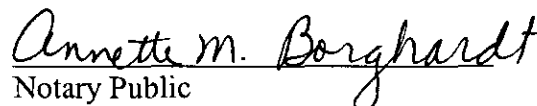
ATTORNEY VERIFICATION

STATE OF MISSOURI     )  
                                      ) ss.  
COUNTY OF COLE     )

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for TRANS NATIONAL TELECOMMUNICATIONS, INC., Applicant in the above captioned proceeding; that I have read the above and foregoing Application and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant.

  
Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 7<sup>th</sup> day of December, 1999.

  
Notary Public

My Commission expires:

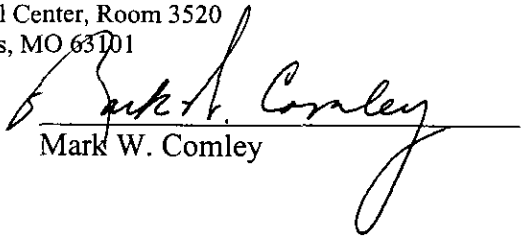
**ANNETTE M. BORGHARDT**  
Notary Public  
State of Missouri  
Commission Expires 3/11/02  
Cole County, MO

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 7<sup>th</sup> day of December, 1999, to:

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

Anthony K. Conroy  
Attorney at Law  
One Bell Center, Room 3520  
St. Louis, MO 63101

  
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Mark W. Comley