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January 5, 2000

FILED

JAN 5 2000

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

Missouri Public
Service Commission

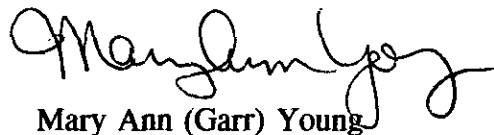
RE: Case No. 70-2000-406
Missouri Telecom, Inc.'s Application for Approval of Interconnection Agreement with
Southwestern Bell Telephone Company

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the Application for Approval of Interconnection Agreement of Missouri Telecom, Inc., for filing with the Commission. Five copies of the Interconnection Agreement between Missouri Telecom, Inc. and Southwestern Bell Telephone Company (SWBT) are also enclosed, per the Notice of Waiver of Interconnection Agreement Filing Requirements issued January 4, 1999. A diskette copy is not available. Please note that the Interconnection Agreement has been page-numbered seriatim in advance.

Thank you for your assistance in processing this filing. Copies are being served on the Office of Public Counsel, General Counsel, and counsel for SWBT. If there are any questions, please call me at 634-8109.

Sincerely,


Mary Ann (Garr) Young

Enclosure

cc: Office of Public Counsel
General Counsel's Office
SWBT Legal Department
Kevin Wormington, Missouri Telecom, Inc.

FILED

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

JAN 5 2000

Missouri Public
Service Commission

Application of)

Missouri Telecom, Inc.)

Case No. TO-2000-406

for Approval of an Interconnection)

Agreement Under the)

Telecommunications Act of 1996)

APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT

COMES NOW Missouri Telecom, Inc., (Missouri Telecom), and files its Application for Approval of Interconnection Agreement (Agreement) between Missouri Telecom and Southwestern Bell Telephone Company (SWBT) under the Telecommunications Act of 1996 (Federal Act). In support of that Application, Missouri Telecom states as follows:

I. INTERCONNECTION AGREEMENT REACHED

Missouri Telecom presents to this Commission for approval an Interconnection Agreement entered into between SWBT and Missouri Telecom, executed pursuant to the terms of the Federal Act. A copy of the Agreement is provided as Exhibit A. The Agreement consists of 610 pages numbered seriatim in the bottom right corner, including 24 attachments, 12 appendices, and 2 exhibits which are incorporated into the Agreement. There are no outstanding issues between Missouri Telecom and SWBT that need the assistance of mediation or arbitration. The Agreement adopts the terms of the AT&T/SWBT Agreement approved by the Commission in Case Nos. TO-97-40 and TO-98-115, pursuant to Section 252(i) of the Federal Act.¹

¹In a footnote appearing on seriatim Page 39, which is also numbered Page 39 of 39 of General Terms and Conditions, SWBT has reserved certain rights and asserts that SWBT "has signed this document under compulsion of federal and/or state law."

II. REQUEST FOR APPROVAL

Missouri Telecom seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act and Missouri law. 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.

Missouri Telecom 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 the parties.

The agreement includes **seriatim** page numbers in the lower right hand corner of each page; thus, the Commission should not need to order an additional page-numbered copy of the Agreement to be filed upon approval.

III. STANDARD FOR 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 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.

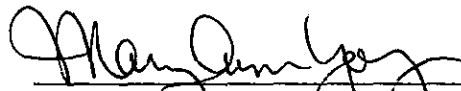
IV. MISSOURI LAW

The executed Agreement is consistent with Missouri Law.

V. CONCLUSION

For the reasons set forth above, Missouri Telecom respectfully requests that the Commission approve the Agreement expeditiously.

Respectfully submitted,



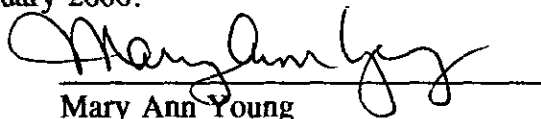
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Attorney for Missouri Telecom, Inc.

Dated: January 5, 2000

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was hand-delivered or mailed by first class mail, postage prepaid, to the Office of Public Counsel and counsel for Southwestern Bell Telephone Company this 5th day of January 2000.

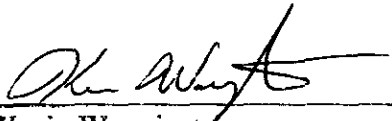


Mary Ann Young

STATE OF Missouri)
)
COUNTY OF Barry) ss.

VERIFICATION

I, Kevin Wormington, being duly sworn according to law, depose and say that I am an officer of Missouri Telecom, Inc.; that I am authorized to and do make this verification for it; and that the facts set forth in the above Application are true and correct to the best of my knowledge, information and belief.


Kevin Wormington
Secretary/Treasurer

Gary Wellbaum
Notary Public, State of Missouri
County of Barry
My Commission Exp. 01/13/2001

SUBSCRIBED AND SWORN to me this 3 day of JAN, 1999.


Notary Public