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January 20, 2000

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

FILED²

JAN 20 2000

Missouri Public
Service Commission

70-2000-454

Re: Adelpia Business Solutions Operations, Inc./SWBT Interconnection Agreement

Dear Mr. Roberts:

Please find enclosed for filing an original and fourteen copies of the verified Application Of Adelpia Business Solutions Operations, Inc. For Approval Of An Interconnection Agreement Pursuant To The Telecommunications Act of 1996. Also please find enclosed for filing an original and five copies of the actual Interconnection Agreement with the pages numbered seriatim in the bottom right hand corner.

A copy of this filing has been sent this date to counsel for Southwestern Bell Telephone Company and the Office of the Public Counsel. Thank you.

Sincerely,


Brent Stewart

CBS/bt

Enclosure

cc: Counsel for SWBT
Office of the Public Counsel
Jennifer Anderson

FILED²

JAN 20 2000

Missouri Public
Service Commission

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of The Application of)
Adelphia Business Solutions Operations, Inc.)
for Approval of an Interconnection Agreement)
with Southwestern Bell Telephone Company)
Pursuant to the Telecommunications Act of 1996.)

Case No. TO-2000- 454

APPLICATION OF ALLEGIANCE TELECOM, INC. FOR APPROVAL OF
AN INTERCONNECTION AGREEMENT UNDER THE
TELECOMMUNICATIONS ACT OF 1996

Comes now Adelphia Business Solutions Operations, Inc. ("Adelphia"), by and through local counsel, and hereby files this Application for approval of its Interconnection Agreement ("the Agreement") pursuant to the Telecommunications Act of 1996 ("FTA 96") between Southwestern Bell Telephone Company ("SWBT") and Adelphia, and respectfully states as follows:

I. INTERCONNECTION AGREEMENT ADOPTED

Adelphia, a Delaware corporation, is a provider of competitive basic local and interexchange telecommunications services in several states. Adelphia received its Missouri certificates of service authority to provide basic local and interexchange/non-switched local exchange telecommunications services in Case Nos. TA-2000-215 and TA-2000-315, respectively. Pursuant to 4 CSR 240-2.060(4)(E), Adelphia refers the Commission to the above-referenced cases and incorporates by reference herein any required documentation or information which has been previously provided to the Commission in those cases.

Adelphia in this Application presents to this Commission for approval the Agreement, filed herewith and executed pursuant to Section 252(i) of the FTA 96. The Agreement is virtually and in all material respects identical to, and is an adoption of, the Interconnection Agreement between SWBT and AT&T which previously was approved by this Commission as a result of Case Nos.

TO-97-40 and TO-98-115. Adelphia and SWBT executed the Agreement on November 29, 1999 and December 3, 1999, respectively. Said Agreement consists of thirty-four (34) pages plus Attachments and Appendices. There are no outstanding issues between Adelphia and SWBT which require mediation or arbitration.

II. REQUEST FOR APPROVAL

Adelphia seeks the Commission's approval of the Agreement, consistent with the provisions of the FTA 96 and applicable Missouri law. Adelphia believes that the implementation of this Agreement complies fully with the FTA 96 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, provides interconnectivity, and increases customer choices for telecommunications services once Adelphia has filed and received Commission approval of its applicable tariffs.

Adelphia respectfully requests that the Commission grant expeditious approval of this Agreement, without change, suspension or other delay in its implementation. The Agreement is virtually identical to, and is an adoption of, the SWBT and AT&T Interconnection Agreement previously approved by the Commission. As such, Adelphia does not believe that a contested docket or intervention by other parties, other than perhaps by SWBT, is necessary or appropriate.

III. STANDARD FOR REVIEW

The statutory standards of review are set forth in Section 252(e) of the Telecommunications Act of 1996 which provides as follows:

- (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) **GROUND FOR REJECTION** - The State commission may only reject -

(A) an agreement (or any portion thereof) discriminates 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...

The attached affidavit of John Glicksman, Vice President and General Counsel for Adelphia, establishes that the Agreement submitted herein satisfies these standards and Commission approval of the Agreement is otherwise consistent with Section 252(i) of the FTA 1996.

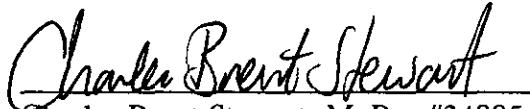
IV. MISSOURI LEGISLATION

The executed Agreement also is consistent with Chapter 392 RSMo because it is in all material respects the same as the Interconnection Agreement between SWBT and AT&T previously approved by the Commission and other AT&T/SWBT "opt-in" Interconnection Agreements recently approved by the Commission.

V. CONCLUSION

WHEREFORE, Adelphia Business Solutions Operations, Inc. respectfully requests that the Commission approve the Interconnection Agreement between Adelphia and SWBT as expeditiously as possible.

Respectfully Submitted,

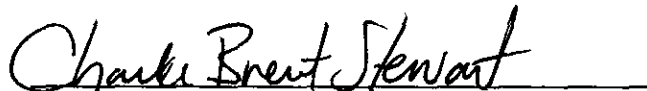


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**ATTORNEY FOR APPLICANT
ADELPHIA BUSINESS SOLUTIONS
OPERATIONS, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Application of Adelphia Business Solutions Operations, Inc. For Approval of an Interconnection Agreement with Southwestern Bell Telephone Company Pursuant to the Telecommunications Act of 1996, with Attachments, was sent to counsel for Southwestern Bell Telephone Company, and the Office of the Public Counsel, by depositing same in the United States Mail, first-class postage prepaid, or by hand-delivery, this 20th day of JANUARY, 2000.



BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Application of)
Adelphia Business Solutions Operations,)
Inc. for Approval of an Interconnection) Case No. TO-2000-

Agreement with Southwestern Bell)
Telephone Company Pursuant to the)
Telecommunications Act of 1996.)

AFFIDAVIT OF

STATE OF *Pennsylvania*)
COUNTY OF *Potter*) SS

Before me the Undersigned Authority, on the *18th* day of *January*, *2000*, personally appeared NAME, TITLE of Adelphia Business Solutions Operations, Inc., ("Adelphia") who, upon being by me duly sworn on oath deposed and said the following:

1. My name is John Glicksman. I am over 21 years of age, of sound mind and competent to testify to the matters stated herein. I am the Vice President and General Counsel for Adelphia, and I have personal knowledge, on behalf of Adelphia, concerning the Interconnection Agreement ("Agreement") between Southwestern Bell Telephone Company ("SWBT") and Adelphia which is the subject of the Application in the above-reference d case. Pursuant to Section 252(i) of the Telecommunications Act of 1996, Adelphia has executed said Agreement on November 29, 1999 and SWBT has executed said Agreement on December 3, 1999. I am fully familiar with the terms of said Agreement.

2. The Agreement incorporates its price schedules, exhibits and appendices into an integrated package. The Agreement incorporates the identical terms and conditions as the Interconnection Agreement between AT&T Communications and SWBT, which was previously approved by the Missouri Public Service Commission as a result of Case Nos. TO-97-40 and TO-98-115. Accordingly, the Agreement does not discriminate against any telecommunications carrier that is not a party to the Agreement. The Agreement should be

available to any similarly situated local service provider seeking to negotiate a similar interconnection agreement.

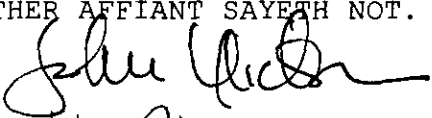
3. The Agreement provides for interim number portability, and ultimately envisions the development and implementation of long term number portability.

4. The implementation of the Agreement is consistent with the Telecommunications Act of 1996 and is in the public interest, convenience and necessity. The Agreement will allow the exchange of traffic between SWBT and Adelphia within the State of Missouri. This Agreement also is consistent with the provisions of Chapter 392 RSMo.

5. Pursuant to the terms of the Agreement, Adelphia will provide Missouri customers an alternative to SWBT for their local exchange telecommunications service needs. As such, the Agreement serves the goals of the Telecommunications Act of 1996 of promoting diversity of providers and interconnectivity, and a fully competitive telecommunications marketplace for local exchange services.

6. There are no outstanding issues between the parties that require the assistance of mediation or arbitration at the present time.

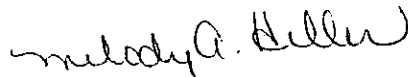
FURTHER AFFIANT SAYETH NOT.


Name John Glicksman
Title Vice President - General Counsel

Subscribed and sworn to before me before this
, 2000 .

18th day of January

Notary Public



My Commission expires:

Notarial Seal
Melody A. Heller, Notary Public
Coudersport Boro, Potter County
My Commission Expires Nov. 17, 2001

[seal]