

LEWIS, RICE & FINGERSH, L.C.

ATTORNEYS AT LAW

500 N. BROADWAY, SUITE 2000
ST. LOUIS, MISSOURI 63102-2147
WWW.LRF.COM
DGEARHART@LEWISRICE.COM

DAVID W. GEARHART
DIRECT (314) 444-1394

TEL (314) 444-7600
FAX (314) 612-1394

December 23, 2002

FILED²
DEC 26 2002

Missouri Public
Service Commission

Dale Roberts
Chief Regulatory Law Judge/Secretary
Missouri Public Service Commission
200 Madison St., Suite 100
P.O. Box 360
Jefferson City, MO 65102

**RE: Motion For Expedited Approval Of Application For Certificate Of Service
Authority To Provide Shared Tenant Services In The State Of Missouri**
Case No.: ZA-2003-0184

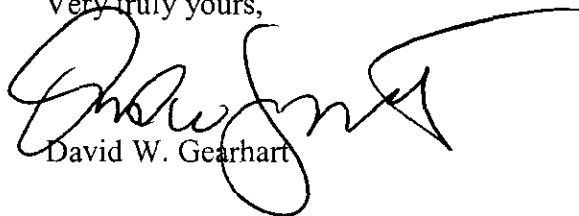
Dear Mr. Roberts:

Enclosed in this package please find an original and eight (8) complete copies of our Motion For *Expedited Approval Of Application For Certificate Of Service Authority To Provide Shared Tenant Services In The State Of Missouri*.

Also enclosed is an additional photocopy of the Motion. Please date-stamp the photocopy and return it to us in the enclosed self-addressed stamped envelope.

Thank you for your attention herein. Please contact me with any and all questions or comments.

Very truly yours,



David W. Gearhart

DWG/pg
Enclosure

cc: Office of Public Counsel (w/ encl.)
General Counsel (w/ encl.)
Southwestern Bell Telephone, L.P., Legal Dept. (w/ encl.)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE MISSOURI

FILED²
DEC 26 2002

Missouri Public
Service Commission

In the matter of the application of ST.)
ANTHONY'S MEDICAL CENTER for)
a certificate of service authority to) Case No. ZA-2003-0184
provide Shared Tenant Services within)
the State of Missouri)

**MOTION FOR EXPEDITED APPROVAL OF APPLICATION FOR CERTIFICATE OF
SERVICE AUTHORITY TO PROVIDE SHARED TENANT SERVICES IN THE
STATE OF MISSOURI**

COMES NOW St. Anthony's Medical Center ("SAMC") pursuant to 4 CSR § 240-2.080(16) and, for its Motion for *Expedited Approval* of Application for Certificate of Service Authority to Provide Shared Tenant Services in the State of Missouri, states as follows:

1. SAMC filed its Application for Certificate of Service Authority to Provide Shared Tenant Services in the State of Missouri on November 18, 2002 (the "Application"). On December 17, 2002, the Commission issued an Order Directing Filing noting that Staff of the Commission had not yet filed its recommendation regarding the Application and that "the Commission would like to move this case forward."

2. The Staff of the Commission issued a Staff Recommendation on December 18, 2002 recommending that SAMC's Application be approved.

3. SAMC respectfully requests that the Commission approve the Application on an expedited basis by January 5, 2003. As stated in its Application, SAMC desires to install, own, operate, control, manage and maintain shared tenant services for a location which consists of three adjoining medical professional buildings. The construction of these buildings has been recently completed and the physician-tenants for these buildings will begin occupying the premises beginning in January 2003, with the earliest move-in set to occur on January 6, 2003.

The physician-tenants will require telecommunication services immediately upon occupation of the premises.

4. By approving SAMC's Application by January 5, 2003, SAMC can provide the necessary telecommunication services for its physician-tenants as of their respective move-in date. By granting this Motion, there will be no negative effect on SAMC's customers; in fact, expedited approval of SAMC's Application will ensure that the physician-tenants have immediate access to reliable telecommunications service and, thus, properly serve their patients. SAMC's physician-tenant customers and the public interest will accordingly be benefited if the Commission acts by January 5, 2003.

5. This Motion was not filed earlier because SAMC expected that it would have the necessary approval prior to January 2003, the month during which many of the physician-tenants would be moving in to the new buildings. Due to the current status of its Application and because SAMC has been notified that physician-tenants will be moving in beginning January 6, 2003, expedited treatment is warranted.

WHEREFORE, St. Anthony's Medical Center respectfully requests that the Missouri Public Service Commission grant it a Certificate of Authority to install, own, operate, control, manage and maintain shared tenant services on an expedited basis by January 5, 2003.

Respectfully submitted,


LEWIS RICE & FINGERSH, L.C.

David W. Gearhart #50292
500 N. Broadway, Suite 2000
St. Louis, Missouri 63102

(314) 444-7600
(314) 612-7786 (Facsimile)

Attorney for Applicant St. Anthony's
Medical Center

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed U.S. postage prepaid this 23rd day of December, 2002 to:

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

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson, MO 65102

Legal Department
Southwestern Bell Telephone, L.P.
One SBC Center, Room 3510
St. Louis, MO 63101

