

KELLEY DRYE & WARREN LLP

A LIMITED LIABILITY PARTNERSHIP

NEW YORK, NY
TYSONS CORNER, VA
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ
BRUSSELS, BELGIUM

1200 19TH STREET, N.W.

SUITE 500

WASHINGTON, D.C. 20036

FACSIMILE
(202) 955-9792
www.kelleydrye.com

AFFILIATE OFFICES
JAKARTA, INDONESIA
MUMBAI, INDIA

ERIN WEBER EMMOTT
DIRECT LINE: (202) 955-9766
EMAIL: eemmott@kelleydrye.com

March 15, 2006

FILED

MAR 16 2006

VIA UPS

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
Governor Office Building
200 Madison Street
Jefferson City, Missouri 65102

**Missouri Public
Service Commission**

Re: Request for Commission Approval of An Interconnection Agreement
between Comcast Phone, LLC and Cellco Partnership d/b/a Verizon
Wireless.

Dear Judge Roberts:

Enclosed please find an original and eight (8) copies of the above-captioned document for filing with the Commission. Also enclosed is a duplicate copy of this filing, and a self-addressed, postage-paid envelope. Please date-stamp the duplicate upon receipt and return it in the envelope provided.

Should you have any questions concerning this matter, please contact me at (202) 955-9766 or via email at eemmott@kelleydrye.com. Thank you for your attention to this matter.

Respectfully submitted,

Erin Weber Emmott

Erin Weber Emmott

Enclosures

FILED

MAR 16 2006

BEFORE THE
STATE OF MISSOURI
PUBLIC SERVICE COMMISSION **Missouri Public
Service Commission**

Request for Commission Approval of)
An Interconnection Agreement between) Case No. _____
Comcast Phone, LLC and)
Celco Partnership d/b/a Verizon Wireless)

JOINT APPLICATION

Comcast Phone of Missouri, LLC d/b/a Comcast Digital Phone ("Comcast Phone"), a competitive local exchange carrier ("CLEC") and Celco Partnership d/b/a Verizon Wireless ("Verizon Wireless"),¹ a commercial mobile radio service ("CMRS") provider (collectively, the "Parties") pursuant to 4 CSR 240-3.545, and to the extent applicable, Section 252(e) of the Communications Act of 1934, as amended (the "Act"), 47 U.S.C. § 252(e), hereby jointly submit to the Missouri Public Service Commission ("Commission") an Interconnection and Reciprocal Compensation Agreement for Commercial Mobile Radio Service (CMRS) (the "Interconnection Agreement") for review and approval.² In support of this joint application, Comcast Phone and Verizon Wireless state as follows:

¹ The following Verizon Wireless entities are also parties to the Interconnection Agreement: CyberTel Cellular Telephone Company, St. Joseph CellTelco and Verizon Wireless (VAW) LLC, all CMRS providers.

² While it is not clear that Section 252 applies to interconnection agreements such as the one between the Parties, out of an abundance of caution, and without waiving any right to assert that the agreement is not subject to the jurisdiction of the Commission, the Parties submit their Interconnection Agreement for Commission review. *See Qwest Communications International Inc. Petition for Declaratory Ruling on the Scope of the Duty to File and Obtain Prior Approval of Negotiated Contractual Arrangements under Section 252(a)(1)*, WC Docket No. 02-89, Memorandum Opinion and Order, 17 FCC Rcd 19337, 19341-42 (2002)(noting the role of the state commissions to determine which agreements require filing for approval).

1. The Parties have entered into good faith negotiations and have executed an interconnection agreement. The Interconnection Agreement was fully executed as January 5, 2006. A copy of the Interconnection Agreement, duly executed by the Parties, is submitted with this joint application as **Attachment A**.

2. The Interconnection Agreement establishes arrangements for the exchange of Local and IntraMTA traffic between the Parties in Missouri. In addition, the Interconnection Agreement provides the terms for interconnecting the Parties' networks and establishes reciprocal compensations arrangements for Local and IntraMTA traffic. The Interconnection Agreement carries a term of two years.


3. In accordance with Section 252(e) of the Act, the Commission is charged with approving or rejecting a negotiated Interconnection Agreement within 90 days of its submission. The Act provides that the Commission may only reject such an agreement if it finds that the agreement or any portion of the agreement discriminates against a telecommunications carrier who is not a party to the agreement or the implementation of the agreement or any portion thereof is not consistent with the public interest, convenience and necessity.

4. The Interconnection Agreement was voluntarily negotiated and agreed to by Comcast Phone and Verizon Wireless, and does not discriminate against a telecommunications carrier not a party to the Interconnection Agreement. Approval of the Interconnection Agreement is consistent with the public interest, convenience and necessity.

WHEREFORE, Comcast Phone, LLC and Cellco Partnership d/b/a Verizon Wireless jointly request Commission approval of the Interconnection Agreement pursuant to 4 CSR 240-3.545 and Section 252(e) of the Act as expeditiously as possible.

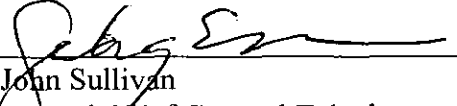
Respectfully submitted,

Cellco Partnership d/b/a Verizon Wireless

By: 
Name: Elaine Critides
Title: Senior Attorney

Date: 2/14/06

Comcast Phone, LLC

By: 
Name: John Sullivan
Title: VP and Chief Counsel Telephony

Date: 03/08/06