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January 23, 2004

FILED²

JAN 23 2004

Missouri Public
Service Commission

Mr. Dale Hardy Roberts
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

RE: Case No. _____

Application of **Communications Network Billing, Inc.** for Certificate of Service Authority to Provide Intrastate Interexchange and Non-Switched Local Exchange Telecommunications Services

Dear Mr. Roberts:

Enclosed for filing on behalf of **Communications Network Billing, Inc.**, please find an original and five (5) copies of an **"APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY AND FOR COMPETITIVE CLASSIFICATION."** Also enclosed is Communications Network Billing, Inc.'s proposed initial interexchange and non-switched local exchange services tariff, Mo.P.S.C. Tariff No. 1, which bears a 45-day effective date.

Please see that this filing is brought to the attention of the appropriate Commission personnel.

Thank you for your cooperation and assistance in this matter.

Sincerely,



William D. Steinmeier

Enclosures

cc: General Counsel
Office of Public Counsel
Patrick D. Crocker
Mary Ann (Garr) Young

In the Matter of the Application of)
Communications Network Billing, Inc.)
for a Certificate of Service Authority to Provide)
Intrastate Interexchange and Non-Switched) Case No. _____
Local Exchange Telecommunications Services)
to the Public within the State of Missouri and for)
Competitive Classification.)

Comes now **Communications Network Billing, Inc.** ("CNBI" or "Applicant"), by and through counsel, and pursuant to Sections 392.361, 392.410, 392.420, 392.430, 392.440 RSMo, and 4 CSR 240-2.060 and 4 CSR 240-3.510, files this verified Application requesting that the Missouri Public Service Commission (hereinafter "the Commission") issue an order that:

- (a) grants Applicant a certificate of service authority to provide intrastate resold, interexchange and non-switched local exchange telecommunications services, as herein more specifically defined, pursuant to Chapter 392 RSMo;
- (b) grants competitive status to Applicant and Applicant's requested services;
- (c) waives certain Commission rules and statutory provisions pursuant to Sections 392.420 and 392.361 RSMo 2000, consistent with the Commission's past treatment of other certificated providers of competitive interexchange/dedicated private line telecommunications services; and
- (d) approves Applicant's proposed tariffs.

1. Applicant is a foreign corporation formed and operating under the laws of the State of Nevada and is duly authorized to transact business in the State of Missouri. The character of the business performed by Applicant is telecommunications. Pursuant to the relevant provisions of 4 CSR 240-2.060, a certificate of authority from the Missouri

Secretary of State's Office is attached hereto and incorporated herein by reference as **Appendix A**. Applicant's principal place of business is 6701 Democracy Boulevard, Suite 300, Bethesda, Maryland 20817.

2. All communications, notices, orders and decisions respecting this Application and proceeding should be addressed to:

William D. Steinmeier
Mary Ann (Garr) Young
William D. Steinmeier, P.C.
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Myoung0654@aol.com

and to:

Patrick D. Crocker
Early, Lennon, Crocker & Bartosiewicz, P.L.C.
900 Comerica Building
Kalamazoo, Michigan 49007-4752
Telephone: (269) 381-8844
Fax: (269) 381-8822
Email: pcrocker@earlylennon.com

Questions concerning Applicant's ongoing operations should be directed to Mr. Crocker at the above address and phone number. Questions regarding Applicant's proposed tariff should be directed to Ms. Young.

3. By this Application, Applicant proposes to provide various types of resold intrastate, interexchange and non-switched private line telecommunications services throughout the state of Missouri. Specifically, Applicant seeks to provide a full range of "1+" interexchange services, MTS, out-WATS, in-WATS, and Calling Card Services, and

where appropriate, non-switched local exchange/private line services. Applicant provides telecommunications services primarily to business customers.

4. Pursuant to 4 CSR 4 CSR 240-3.510(1), which requires that an application for a certificate of service authority to provide interexchange, local exchange or basic local exchange service shall include a proposed tariff with no less than a forty-five (45) day effective date, Applicant is separately filing its proposed interexchange (IXC) and non-switched local exchange (LE) tariff, designated as Mo. P.S.C. Tariff No. 1. Applicant's proposed tariff contains the rules, conditions and description of services and rates, and bears an effective date of March 8, 2004, the required forty-five (45) days. Applicant respectfully requests approval of its IXC and non-switched local exchange tariff, Mo. P.S.C. Mo. Tariff No. 1.

5. Applicant requests that it and all its services proposed herein be classified as competitive. The Applicant believes that the highly developed state of the interexchange and local exchange telecommunications services market in Missouri and nationwide ensures that its proposed services will be subject to sufficient competition to warrant a less rigorous degree of regulation.

6. As a new market entrant, Applicant requests streamlined regulatory treatment afforded similarly situated telecommunications carriers in Missouri. Likewise, to the extent the Commission has granted other competitive interexchange and local exchange carriers a waiver of certain of the Commission's rules and regulations, Applicant respectfully requests that it be granted the same waivers.

7. Consistent with the Commission's treatment of other certificated telecommunications companies, Applicant respectfully requests that, pursuant to

§392.361.5 and §392.420, RSMo, the following statutes and regulations be waived with respect to its interexchange and non-switched local exchange service offerings:

STATUTES

§ 392.210.2	--	Uniform System of Accounts
§ 392.240(1)	--	Rates-Rentals-Service & Physical Connections
§ 392.270	--	Valuation of Property (Ratemaking)
§ 392.280	--	Depreciation Accounts
§ 392.290	--	Issuance of Securities
§ 392.300.2	--	Acquisition of Stock
§ 392.310	--	Issuance of Stock and Debt
§ 392.320	--	Stock Dividend Payment
§ 392.330	--	Issuance of Securities, Debts and Notes
§ 392.340	--	Reorganization(s)

RULES

4 CSR 240-3.545(2)(C)	--	Posting of Tariffs
4 CSR 240-10.020	--	Depreciation Fund Income
4 CSR 240-30.040	--	Uniform System of Accounts
4 CSR 240-33.030	--	Minimum Charges

8. Applicant will comply fully with all applicable Commission rules except those that are specifically waived by the Commission pursuant to the Company's request herein. To the extent that the Commission may modify its waiver policies, Applicant respectfully reserves the right to amend its waiver requests accordingly.

9. Applicant herein states, in accordance with 4 CSR 240-2.060(1)(K), that there are no pending actions or final unsatisfied judgments or decisions against Applicant in any state or federal agency or court which involve customer service or rates for which action, judgment, or decision has occurred within three (3) years of the date of this Application.

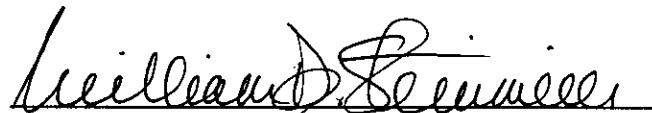
10. Pursuant to 4 CSR 240-2.060(1)(L), Applicant hereby states that the Company does not have any overdue annual reports or assessment fees owed to the Missouri Public Service Commission.

11. Applicant has the requisite managerial, technical, and financial qualifications to operate a viable business and provide the services sought to be provided in Missouri.

12. Applicant submits that the public interest will be served by Commission approval of this application because Applicant's proposed services will create and enhance competition and expand customer service options consistent with the legislative goals set forth in the federal Telecommunications Act of 1996 and Chapter 392 RSMo. Prompt approval of this application also will expand the availability of innovative, high quality, and reliable telecommunications services within the State of Missouri.

WHEREFORE, Communications Network Billing, Inc. respectfully requests that the Commission: (1) grant it a certificate of service authority to provide intrastate, interexchange and non-switched local exchange telecommunications services within the State of Missouri; (2) grant Applicant and its proposed services competitive status; (3) waive the application of the above-referenced statutes and Commission rules; and (4) approve its separately-submitted tariff.

Respectfully submitted,

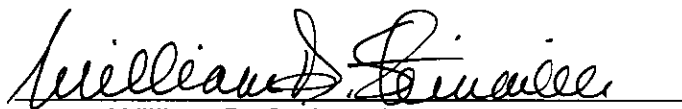


William D. Steinmeier, Mo. Bar #25689
Mary Ann (Garr) Young, Mo. Bar #27951
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Email: wds@wdspc.com
Myoung0654@aol.com

ATTORNEYS FOR COMMUNICATIONS
NETWORK BILLING, INC.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Verified Application has been sent this date to the General Counsel's Office and the Office of the Public Counsel by hand-delivery, this 23rd day of January 2004.



William D. Steinmeier

APPENDIX A
Secretary of State Certificate

STATE OF MISSOURI



Matt Blunt
Secretary of State
CERTIFICATE OF AUTHORITY

WHEREAS,

COMMUNICATIONS NETWORK BILLING, INC.
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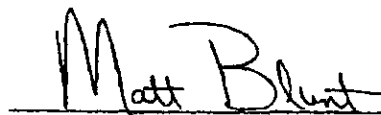
using in Missouri the name

COMMUNICATIONS NETWORK BILLING, INC.

has complied with the General and Business Corporation Law which governs Foreign Corporations; by filing in the office of the Secretary of State of Missouri authenticated evidence of its incorporation and good standing under the Laws of the State of Nevada.

NOW, THEREFORE, I, MATT BLUNT, Secretary of State of the State of Missouri, do hereby certify that said corporation is from this date duly authorized to transact business in this State, and is entitled to all rights and privileges granted to Foreign Corporations under the General and Business Corporation Law of Missouri.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 29th day of September, 2003.


Secretary of State



Verification

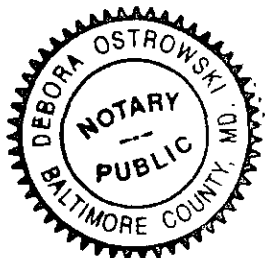
VERIFICATION

C. Hurley Cox, President of Communications Network Billing, Inc., first being duly sworn on oath, deposes and says that he has read the foregoing Application and verifies that the statements made therein are true and correct to the best of his knowledge, information and belief.

Communications Network Billing, Inc.

By: *C Hurley Cox*
Mr. C. Hurley Cox

The foregoing instrument was acknowledged before me this 15th day of January 2004
by C. Hurley Cox.



Notary Public: *Debora Ostrowski*
Commission Expires: 7/1/06
County Baltimore State Maryland