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July 26, 1999

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

FILED

JUL 27 1999

Missouri Public
Service Commission

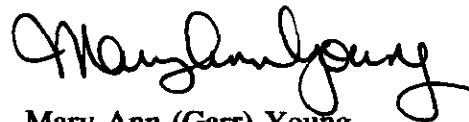
RE: Case No. TO-2000-54
DSLnet Communications, LLC's, Application for Approval of Interconnection
Agreement with Southwestern Bell Telephone Company

Dear Mr. Roberts:

Enclosed please find an original and fourteen copies of the Application for Approval of Interconnection Agreement of DSLnet Communications, LLC (DSLnet), for filing with the Commission. The original and five copies of the Interconnection Agreement between DSLnet and Southwestern Bell Telephone Company (SWBT) are also enclosed, per the Notice of Waiver of Interconnection Agreement Filing Requirements issued January 4, 1999, by the Secretary of the Commission. A diskette copy of the Resale Agreement will be provided at a later date, if available.

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

Sincerely yours,



Mary Ann (Garr) Young

Enclosures

cc: Office of Public Counsel
Southwestern Bell Telephone Company
Mr. Paul Hudson, Swidler Berlin

RECEIVED

JUL 26 1999

Records
Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED

JUL 27 1999

Missouri Public
Service Commission

Application of)
)
DSLnet Communications, LLC)
)
for Approval of an Interconnection)
Agreement Under the)
Telecommunications Act of 1996)

Case No. TO 2000-54

APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT

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

I. INTERCONNECTION AGREEMENT REACHED

DSLnet presents to this Commission for approval an Interconnection Agreement entered into between SWBT and DSLnet, executed pursuant to the terms of the Federal Act. A copy of the Agreement is provided as Exhibit A. This Interconnection Agreement adopts the terms of the Interconnection Agreement between Northpoint Communications, Inc., (Northpoint) and SWBT¹ pursuant to Section 252(i) of the Federal Act (See seriatim page number 6, also labeled as GENERAL TERMS AND CONDITIONS - MO PAGE 1 of 33). This Agreement was executed by DSLnet on June 28, 1999, and by SWBT on July 1, 1999 (See page 37). The

¹The Interconnection Agreement between Northpoint and SWBT which is adopted by the Interconnection Agreement filed herein was approved by the Commission by Order issued January 6, 1999, in Case No. TO-99-168 (See footnote *** on seriatim page number 38). SWBT has reserved certain rights in footnotes * and **, pending appeal of the Commission's Order in Case Nos. TO-97-40 and TO-98-115, and asserts in footnote * on Page 32 of 33 (seriatim page number 37) of this Interconnection Agreement that "Southwestern Bell has signed this document under compulsion of federal and/or state law".

Agreement consists of 633 pages numbered seriatim in the bottom right corner, including 24 attachments, 14 appendices, and 2 exhibits which are incorporated into the Agreement. There are no outstanding issues between DSLnet and SWBT that need the assistance of mediation or arbitration.

II. REQUEST FOR APPROVAL

DSLnet 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.

DSLnet 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 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.

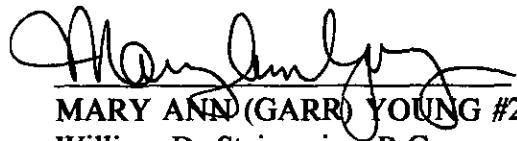
IV. MISSOURI LAW

The executed Agreement is consistent with Missouri Law.

V. CONCLUSION

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

Respectfully submitted,



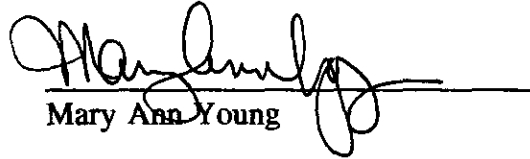
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Telephone: 573-634-8109
Facsimile: 573-634-8224

Attorney for DSLnet
Communications, LLC

Dated: 26 July, 1999

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 26th day of July 1999.


Mary Ann Young

VERIFICATION

County of New Haven

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s/s

State of Connecticut

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I, Alan Bolduc, being first duly sworn, depose and state that I am Vice President – Operations of dsl.net, inc., the sole member of DSLnet Communications, LLC, the Applicant in the subject proceeding; that I am authorized to make this Verification on behalf of DSLnet Communications, LLC; that I have read the foregoing application and exhibits and know the content thereof; that the same are true and correct to the best of my knowledge, information, and belief.

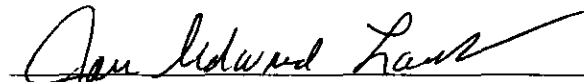
Executed on this 23rd day of July, 1999.

By:



Alan Bolduc

Subscribed to and sworn before me this 23rd day of July, 1999.


Notary Public

My Commission expires on My Commission Expires December 31, 2000