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March 9, 2000

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

MAR 9 2000

Re:

Vectris Telecom, Inc.

Missouri Public Service Commission

Dear Judge Roberts:

TO-2000-555

Enclosed for filing on behalf of Vectris Telecom, Inc. please find the original and fourteen copies of an Application for Approval of Interconnection Agreement Under the Telecommunications Act of 1996. I also enclose the original and five copies of the Interconnection Agreement, which is marked as Attachment 2 to the Application.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley

comleym@ncrpc.com

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office Anthony K. Conroy M. C. Arendes, Jr. Brian M. McDermott

BEFORE THE PUBLIC SERVICE COMMISSION STATE OF MISSOURI



Application of VECTRIS TELECOM, INC. for Approval of Interconnection Agreement Under the Telecommunications Act of 1996.)))	Case No Missouri Public Service Commission
		TO-2000-555

APPLICATION FOR APPROVAL OF INTERCONNECTION AGREEMENT UNDER THE TELECOMMUNICATIONS ACT OF 1996

Comes now Vectris Telecom, Inc. (hereinafter "Vectris", or "Applicant") and hereby files this Application for Approval of an Interconnection Agreement (the Agreement) between Southwestern Bell Telephone Company (SWBT) and Vectris under the Telecommunications Act of 1996 (the Federal Act) and would respectfully show the Missouri Public Service Commission (the Commission) the following:

I. THE APPLICANT

VECTRIS is presently applying to this Commission for a certificate of service authority to offer and provide basic local exchange telecommunications service in certain specified exchanges in Missouri. Its application was filed with the Commission on January 7, 2000 and was assigned Case No. TA-2000-408. VECTRIS is a Delaware Corporation, duly registered and in good standing with the Missouri Secretary of State. Attached as Attachment 1 is a Certificate of Good Standing-Foreign Corporation issued by the Missouri Secretary of State respecting VECTRIS.

II. INTERCONNECTION/RESALE AGREEMENT REACHED

VECTRIS presents to this Commission for approval an Interconnection Agreement with Southwestern Bell Telephone Company (SWBT) negotiated and executed pursuant to the terms of the Federal Act (Agreement, Attachment 2). This Agreement was entered into pursuant to Section 252(a)(1) of the Federal Act, and SWBT and VECTRIS executed the Agreement effective February 29, 2000. The General Terms and Conditions of the Agreement contains 97 pages, and is followed



by 27 separate appendices. There are no outstanding issues between SWBT and VECTRIS that need the assistance of mediation or arbitration.

III. DESIGNATED CONTACTS

The designated contacts for purposes of this Application are:

Mark W. Comley
Newman, Comley & Ruth
601 Monroe Street, Suite 301
Jefferson City, MO 65101
Telephone: 573 634-2266
Fax: 573 636-3306
e-mail -- comleym@ncrpc.com

and

Mr. M.C. Arendes, Jr. Vice President and General Counsel VECTRIS TELECOM, INC. 5000 Plaza on the Lake, Suite 305 Austin, TX 78746

Telephone: 512-732-7409 Fax: 512-732-7620

IV. REQUEST FOR APPROVAL

VECTRIS seeks the Commission's approval of the Agreement, consistent with the provisions of the Federal Act. 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. The Agreement promotes diversity in providers, and increases customer choices for telecommunications services.

VECTRIS 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 competitors, and intervention by other parties is neither necessary nor appropriate.

V. STANDARD OF 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; or

VI. MISSOURI LEGISLATION

The negotiated and executed Agreement is consistent with Chapter 392, RSMo 1994 as amended by S.B. 507 of the Missouri Laws of 1996 and effective August 28, 1996.

VII. CONCLUSION

For the reasons set forth above, VECTRIS respectfully prays that the Commission approve the Agreement expeditiously.

Respectfully submitted,

VECTRIS TELECOM, INC.

By:

Mark W\ Comley

#28847

Newman, Comley & Ruth PA

601 Monroe, Suite 301

P.O. Box 537

Jefferson City, MO 65102-0537

Attorneys for VECTRIS TELECOM, INC.

573/634-2266 (Telephone)

573/636-3306 (FAX)

comleym@ncmc.com

ATTORNEY VERIFICATION

STATE OF MISSOURI

ss.

COUNTY OF COLE

I, Mark W. Comley, being first duly sworn, do hereby certify, depose and state that I am the attorney for VECTRIS TELECOM, INC., Applicant in the above captioned proceeding; that I have read the above and foregoing Application and the allegations therein contained are true and correct to the best of my knowledge, information and belief; and I further state that I am authorized to verify the foregoing application by the above said applicant.

Mark W. Comley

Subscribed and sworn to before me, a Notary Public, this 9th day of March, 2000.

My Commission expires:

Notary Public

Commission Expires 3/11/02
Cole County, MO

ANNETTE M. BORGHARDT

Notary Public

State of Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document (without Attachment 2 which will be made available upon request) was sent by U.S. Mail, postage prepaid, or hand delivered, on this 9th day of March, 2000, to:

Office of Public Counsel P.O. Box 7800 Jefferson City, MO 65102 Anthony K. Conroy Attorney at Law One Bell Center, Room 3520 St. Louis, MO 63101 General Counsel
Missouri Public Service
Commission
P.O. Box 360

Jefferson City, MO 65102

Mark W. Comley

ATTACHMENT 1

CERTIFICATE OF CORPORATE GOOD STANDING - FOREIGN CORPORATION

No. F00476930

STATE OF MISSOURI

Rebecca McDowell Cook **Secretary of State**

CORPORATION DIVISION

CERTIFICATE OF CORPORATE GOOD STANDING - FOREIGN CORPORATION

I, REBECCA McDOWELL COOK, Secretary of State of the State of Missouri, do hereby certify that the records in my office and in my care and custody reveal that

VECTRIS TELECOM, INC.

using in Missouri the name

VECTRIS TELECOM, INC.

a DELAWARE corporation filed its Evidence of Incorporation with this State on the 1st day of DECEMBER, 1999, and is in good standing, having fully complied with all requirements of this office.

IN TESTIMONY WHEREOF, I have set my hand and imprinted the GREAT SEAL of the State of Missouri, on this, the 9th day of MARCH, 2000.

Secretary of State