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July 5, 2002

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

RE: CA-2002-1153

Application of Xspedius Management Co. Switched Services, LLC for
Certificate of Service Authority to Provide Basic Local Exchange
Telecommunications Services

Dear Mr. Roberts:

Enclosed for filing on behalf of Xspedius Management Co. Switched Services, LLC., please find an original and eight (8) copies of **"XSPEDIUS' REPLY TO STAFF RESPONSE."**

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

Copies of this filing are being hand-delivered, or sent via postage-prepaid U.S. mail, to the Office of Public Counsel and the Commission's General Counsel's office.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By: 
William D. Steinmeier

Enclosures

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the matter of the Application of)
)
Xspedius Management Co. Switched)
Services, LLC) Case No. CA-2002-1153
)
for a certificate of service authority to provide Basic)
Local Telecommunications Service in portions of the)
State of Missouri and for competitive classification)

XSPEDIUS' REPLY TO STAFF RESPONSE

COMES NOW Xspedius Management Co. Switched Services, LLC ("Xspedius" or "Applicant"), by its undersigned counsel, and offers this Reply to "Staff's Response to Commission Order and Staff's Motion to Consolidate" filed in this matter on June 28, 2002, to wit:

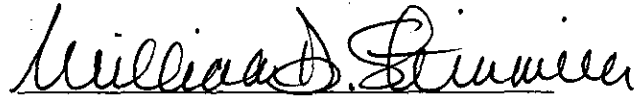
1. The instant Application is one of three related applications filed on June 24, 2002, and a fourth filed on July 2, 2002, involving the proposed sale of the assets of ACSI Local Switched Services, Inc. and American Communication Services of Kansas City, Inc. (the "e.spire" Operating Entities) to Xspedius Management Co. Switched Services, LLC and Xspedius Management Co. of Kansas City, LLC (the "Xspedius Operating Entities") pursuant to a sale agreement approved by the United States Bankruptcy Court for Delaware on June 5, 2002.
2. The Joint Application seeking this Commission's approval of the transfer of assets is Case No. TM-2002-1155. The Application of Xspedius Management Co. Switched Services, LLC for a certificate of service authority to provide basic local exchange telecommunications

services in Missouri is Case No. CA-2002-1153, the instant case, and its Application for a certificate of service authority to provide interexchange and local exchange telecommunications services in Missouri is Case No. LA-2003-0001. The Application of Xspedius Management Co. of Kansas City, LLC for authority to provide interexchange and local exchange telecommunications in Missouri is Case No. XA-2002-1154.

3. The Applicants are deeply appreciative of the prompt and arduous efforts of the Commission, the Regulatory Law Judge and the Commission Staff in evaluating and responding to this, and the three related, applications in such an expeditious manner.
4. The Applicants herein have no objection to the Staff request that the Commission consolidate these cases pursuant to 4 CSR 240-2.110(3) for procedural purposes. However, the Applicants request that each application will continue to bear its own case number so that the procedural process, and actual authority granted, in each case may be readily tracked.
5. Xspedius concurs in Staff's recommendation that the Commission, pursuant to § 392.410.6 RSMo 2000, issue Xspedius Management Co. Switched Services, LLC a temporary certificate to provide basic local telecommunications services throughout all exchanges currently served by Southwestern Bell Telephone Company. The issuance of a temporary certificate would assure that the transfer of assets authorized by the Bankruptcy Court is accomplished expeditiously while still implementing the Commission's standard procedure of providing notice to interested parties of applications for permanent certificates of service authority. Xspedius' application in this case

Certificate of Service

I hereby certify that a copy of this document has been hand delivered or mailed by first class mail, postage prepaid, to the Office of the General Counsel of the Missouri Public Service Commission, and to the Office of Public Counsel, on this 5th day of July 2002.


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