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July 18, 2002

FILED³
JUL 18 2002

Missouri Public
Service Commission

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 a **"MOTION FOR LEAVE TO AMEND APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY BY INTERLINEATION"** in the above-styled matter.


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, the Commission General Counsel's office, and Ms. Sondra Morgan of Brydon, Swearingen & England on behalf of the Small Telephone Company Group.

Thank you for your cooperation and assistance in this matter.

Sincerely,

WILLIAM D. STEINMEIER, P.C.

By: 
William D. Steinmeier

Enclosure

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED³
JUL 18 2002

Missouri Public
Service Commission

In the matter of the Application of)
)
Xpedius Management Co. Switched)
Services, LLC)
)
for a certificate of service authority to provide Basic)
Local Telecommunications Service in portions of the)
State of Missouri and for competitive classification)

Case No. CA-2002-1153

**MOTION FOR LEAVE TO AMEND
APPLICATION FOR CERTIFICATE OF SERVICE AUTHORITY
BY INTERLINEATION**

COMES NOW Xpedius Management Co. Switched Services, LLC ("Xpedius" or "Applicant"), by its undersigned counsel, pursuant to 4 CSR 240-2.080 (20), and requests leave of the Missouri Public Service Commission ("Commission") to amend its Application in this case in the manner, and for the reasons, stated below. In support of its Motion, Xpedius states as follows:

1. The Application in the instant case was filed on June 24, 2002. A motion requesting expedited treatment was filed simultaneously.
2. On July 2, 2002, the Commission published notice of this application in its "Notice of Applications for Intrastate Certificates of Service Authority and Opportunity to Intervene," establishing an intervention deadline of August 1, 2002 in this matter.

3. On July 9, 2002, the Commission granted Xspedius a temporary certificate of service authority in this case, pursuant to Section 392.410.6 RSMo.
4. By this Application, Xspedius seeks a certificate of service authority consistent with that currently held by American Communications Services of Kansas City, Inc. ("ACSI of Kansas City"), whose assets Xspedius was authorized to acquire by order of this Commission issued July 9, 2002 in Case No. TM-2002-1155. The ACSI of Kansas City basic local exchange authority, granted by the Commission in Case No. TA-96-455, is limited to the exchanges of large Incumbent Local Exchange Companies (ILECs).
5. In paragraph 4 of the Application in this case, Applicant specifies the exchanges in which Xspedius proposes to offer basic local exchange services as those of Southwestern Bell Telephone Company (SWBT), Sprint Missouri, Inc. d/b/a Sprint (Sprint), GTE Midwest Incorporated, d/b/a Verizon Midwest, Inc. (GTE) (or CenturyTel, its successor), and Spectra Communications Group, LLC (Spectra). However, the next sentence mistakenly adds ALLTEL to that list. Xspedius does not propose in this case to provide basic local exchange service in ALLTEL's exchanges, nor in those of any other small ILEC.
6. Paragraphs 14 and 15 of the Application herein (filed June 24, 2002) relate to the provision of basic local telecommunications services in the exchanges of small ILECs. They are not necessary to the Application,

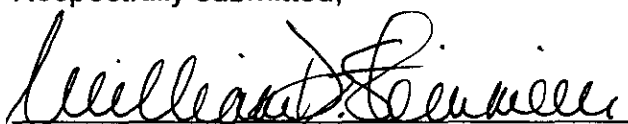
since Xspedius does not seek authority to provide basic local exchange service in the exchanges of small ILECs.

7. For these reasons, Xspedius seeks leave of the Commission to amend, by interlineation, its "Application for Certificate of Service Authority and for Competitive Classification" filed herein on June 24, 2002, as follows:

- a. By deleting the words "and ALLTEL" on page 4, on the second line, within paragraph numbered 4, and inserting the word "and" between the words "CenturyTel," and "Spectra" so that the sentence would read as follows: "The specific SWBT, Sprint, GTE, CenturyTel and Spectra exchanges within which Xspedius proposes to offer service are listed in the incumbent providers' respective local exchange tariffs."
- b. By deleting paragraphs numbered 14 and 15, in their entirety.

WHEREFORE, Applicant Xspedius Management Co. Switched Services, LLC respectfully requests that the Commission grant it leave to amend its Application for Certificate of Service Authority and for Competitive Classification, by interlineation, in the manner specified above.

Respectfully submitted,



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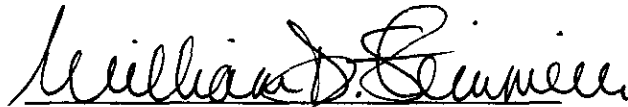
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COUNSEL FOR XSPEDIUS MANAGEMENT
CO. SWITCHED SERVICES, LLC

Dated: July 18, 2002

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, to the Office of Public Counsel, and to counsel for the Small Telephone Company Group, on this 18th day of July 2002.

A handwritten signature in cursive script, reading "William D. Steinmeier". The signature is written in black ink and is positioned above a horizontal line.

William D. Steinmeier