

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

Southwestern Bell Telephone Company d/b/a AT&T	)	
Missouri's Petition for Compulsory Arbitration of	)	
Unresolved Issues for an Interconnection Agreement	)	Case No.IO-2010-0185
With Global Crossing Local Service, Inc. and Global	)	
Crossing Telemanagement Inc.	)	

**AT&T MISSOURI'S SUPPLEMENT TO ITS APPLICATION  
FOR RECONSIDERATION AND/OR REHEARING**

COMES NOW AT&T Missouri,<sup>1</sup> and pursuant to the Commission's January 19 Order granting AT&T Missouri's motion to amend its petition ("Order"), states as follows:

In its Order granting AT&T Missouri's motion, the Commission required that AT&T Missouri supplement its application for reconsideration and/or rehearing by "fil[ing] documentary evidence of Global's request to negotiate." Order, at p. 1. As its response to the Order, AT&T Missouri respectfully directs the Commission's attention to Exhibits A1 through A3 of its amended petition, additional copies of which are attached hereto.

WHEREFORE, AT&T Missouri respectfully requests that the Commission accept this supplement to its January 13 application for reconsideration and/or rehearing, grant the application, and proceed to arbitrate the parties' dispute.

---

<sup>1</sup> Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE  
COMPANY D/B/A AT&T MISSOURI

BY 

Leo J. Bub #34326

Robert J. Gryzmala #32454

Attorney for Southwestern Bell Telephone Company

One AT&T Center, Room 3516

St. Louis, Missouri 63101

314-235-6060 (tn)/314-247-0014 (fax)

[leo.bub@att.com](mailto:leo.bub@att.com)

[robert.gryzmala@att.com](mailto:robert.gryzmala@att.com)

### **CERTIFICATE OF SERVICE**

Copies of this document and all attachments thereto were served on the following  
by e-mail on January 20, 2010.

  
Robert J. Gryzmala

General Counsel  
Kevin Thompson  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)  
[kevin.thompson@psc.mo.gov](mailto:kevin.thompson@psc.mo.gov)

Public Counsel  
Office Of The Public Counsel  
P.O. Box 7800  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Mark P. Johnson  
Lisa Gilbreath  
Sonnenschein Nath & Rosenthal LLP  
4520 Main, Suite 1100  
Kansas City, MO 64111  
[mjohnson@sonnenschein.com](mailto:mjohnson@sonnenschein.com)  
[lgilbreath@sonnenschein.com](mailto:lgilbreath@sonnenschein.com)



June 11, 2009

**VIA UPS GROUND**

Michael S. Shortley, III  
Sr Attorney/Dir Reg Serv  
Global Crossing Telemanagement, Inc.  
180 South Clinton  
Rochester, NY 14646

Re: Interconnection Agreement between AT&T Operations, Inc.<sup>1</sup> ("AT&T") and Global Crossing Telemanagement, Inc. in the State of Missouri.

Dear Michael S. Shortley, III:

As you are aware, the term of the above listed Interconnection Agreement has expired. Pursuant to the term and termination provisions of the above listed Interconnection Agreement, this letter hereby provides official Notice pursuant to the Interconnection Agreement between our companies of AT&T's intent to terminate the aforementioned Agreement.

AT&T requests your prompt attention to this matter. If Global Crossing Telemanagement, Inc. does not wish to enter into a successor agreement, please respond to your assigned negotiator so that the Parties may discuss the contract termination and exiting process.

Should Global Crossing Telemanagement, Inc. desire to enter into a successor agreement, AT&T is available to immediately commence renegotiations of a successor interconnection agreement and requests that you contact your assigned negotiator as soon as possible. In accordance with the timeline for negotiations set forth in the Telecommunications Act, the timeline for negotiations shall be as follows:

Start Date	30 <sup>th</sup> Day	60 <sup>th</sup> Day	90 <sup>th</sup> Day	135 <sup>th</sup> Day*	160 <sup>th</sup> Day*
7/11/09	8/10/09	9/9/09	10/9/09	11/23/09	12/18/09

\*As a result, the period during which either Party may file for arbitration under section 252 (b)(1) of the Federal Telecommunications Act of 1996 shall begin on the 135<sup>th</sup> day and end on the 160<sup>th</sup> day of negotiations respectively.

This timeframe will permit completion of the review of the successor agreement (and any additional discussions or negotiations which may be required), and time for production, signature and filing of a successor agreement at each of the applicable State Commission(s).

Should you have any questions or need further information, please do not hesitate to call your assigned negotiator.

Sincerely,

*Notices Manager*

<sup>1</sup> Denotes one or more AT&T ILECs Illinois Bell Telephone Company d/b/a AT&T Illinois; Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; Nevada Bell Telephone Company d/b/a AT&T Nevada and AT&T Wholesale; The Ohio Bell Telephone Company d/b/a AT&T Ohio; Pacific Bell Telephone Company d/b/a AT&T California; The Southern New England Telephone Company d/b/a AT&T Connecticut and Southwestern Bell Telephone Company d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma and/or AT&T Texas, and Wisconsin Bell, Inc. d/b/a AT&T Wisconsin as applicable.



June 11, 2009

**VIA UPS GROUND**

Michael J. Shortley, III  
Senior Associate & General Counsel  
Global Crossing Local Services, Inc. dba Nations Tel  
1080 Pittsford Victor Rd  
Pittsford, NY 14534

Re: Interconnection Agreement between AT&T Operations, Inc.<sup>1</sup> ("AT&T") and Global Crossing Local Services, Inc. dba Nations Tel in the State of Missouri.

Dear Michael J. Shortley, III:

As you are aware, the term of the above listed Interconnection Agreement has expired. Pursuant to the term and termination provisions of the above listed Interconnection Agreement, this letter hereby provides official Notice pursuant to the Interconnection Agreement between our companies of AT&T's intent to terminate the aforementioned Agreement.

AT&T requests your prompt attention to this matter. If Global Crossing Local Services, Inc. dba Nations Tel does not wish to enter into a successor agreement, please respond to your assigned negotiator so that the Parties may discuss the contract termination and exiting process.

Should Global Crossing Local Services, Inc. dba Nations Tel desire to enter into a successor agreement, AT&T is available to immediately commence renegotiations of a successor interconnection agreement and requests that you contact your assigned negotiator as soon as possible. In accordance with the timeline for negotiations set forth in the Telecommunications Act, the timeline for negotiations shall be as follows:

Start Date	30 <sup>th</sup> Day	60 <sup>th</sup> Day	90 <sup>th</sup> Day	135 <sup>th</sup> Day*	160 <sup>th</sup> Day*
7/11/09	8/10/09	9/9/09	10/9/09	11/23/09	12/18/09

\*As a result, the period during which either Party may file for arbitration under section 252 (b)(1) of the Federal Telecommunications Act of 1996 shall begin on the 135<sup>th</sup> day and end on the 160<sup>th</sup> day of negotiations respectively.

This timeframe will permit completion of the review of the successor agreement (and any additional discussions or negotiations which may be required), and time for production, signature and filing of a successor agreement at each of the applicable State Commission(s).

Should you have any questions or need further information, please do not hesitate to call your assigned negotiator.

Sincerely,

*Notices Manager*

<sup>1</sup> Denotes one or more AT&T ILECs Illinois Bell Telephone Company d/b/a AT&T Illinois; Indiana Bell Telephone Company Incorporated d/b/a AT&T Indiana; Michigan Bell Telephone Company d/b/a AT&T Michigan; Nevada Bell Telephone Company d/b/a AT&T Nevada and AT&T Wholesale; The Ohio Bell Telephone Company d/b/a AT&T Ohio; Pacific Bell Telephone Company d/b/a AT&T California; The Southern New England Telephone Company d/b/a AT&T Connecticut and Southwestern Bell Telephone Company d/b/a AT&T Arkansas, AT&T Kansas, AT&T Missouri, AT&T Oklahoma and/or AT&T Texas, and Wisconsin Bell, Inc. d/b/a AT&T Wisconsin as applicable.

---

**From:** Henry, Michael [mailto:Michael.Henry@Globalcrossing.com]  
**Sent:** Wednesday, July 01, 2009 4:33 PM  
**To:** Allen-Flood, Lynn  
**Subject:** RE: AT&T Notice of Rengotiations in MO - Global Crossing Telemanagement, Inc.

Lynn – we received your notice concerning the Missouri ICA and I am aware of the July 30 deadline for the Kansas ICA. I am also aware that the 9-state BST ICA was signed in 2006 and will coming up for renewal this year and there are probably others as well. We have discussed internally and here is what I would like to propose:

We would intend to negotiate a new 22 state ICA with AT&T to cover all states. I would propose that we start the negotiation clock for the 22 state agreement on July 11, 2009 and be governed by the dates as stated in your letter concerning Missouri – copied below.

Start Date	30 <sup>th</sup> Day	60 <sup>th</sup> Day	90 <sup>th</sup> Day	135 <sup>th</sup> Day*	160 <sup>th</sup> Day*
7/11/09	8/10/09	9/9/09	10/9/09	11/23/09	12/18/09

It would be our preference for AT&T to permit the existing Kansas ICA to continue on a month to month basis until we conclude the 22- state negotiation – rather than expire on July 30 and to be included in this negotiation schedule. In any event, should AT&T insist on the July 30 date – we would intend to have the Kansas ICA included in the outcome of our 22 state agreement.

Please indicate whether this is acceptable to AT&T.

Mickey Henry  
Director, Carrier Relations  
Global Crossing  
706.579.1283

All information contained herein, including any attachments, shall be deemed confidential and proprietary to Global Crossing