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April 14, 2003

**FILED**

**APR 14 2003**

OF COUNSEL

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PATRICK A. BAUMHOER

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

Secretary of PSC  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

**Missouri Public  
Service Commission**

**Re: Request for Approval of Interconnection Agreement Between  
MoKan Dial, Inc. and Sprint Spectrum, L.P.**

Dear Secretary Roberts:

Enclosed please find an original and five (5) copies of the Request of MoKan Dial, Inc. for approval of the Interconnection Agreement between it and Sprint Spectrum, L.P.

If any questions or concerns arise, please let me know.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:tr

Enc.

cc: Donald Stowell  
Harriett Eudy  
Azita Sporano  
Angela Linares  
Dana Joyce, General Counsel  
Michael Dandino, Office of Public Counsel

Trenton Office  
9<sup>th</sup> And Washington  
Trenton, Missouri 64683  
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P.O. Box. 654  
Smithville, Missouri 64089  
816-532-3895  
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BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED

APR 14 2003

Missouri Public  
Service Commission

Request for Approval of Interconnection )  
Agreement Between MoKan Dial Inc., )  
and Sprint Spectrum, L.P. )  
pursuant to Section 252(e) of the )  
Telecommunications Act of 1996. )

Case No. \_\_\_\_\_

**REQUEST FOR APPROVAL OF INTERCONNECTION AGREEMENT  
BETWEEN MOKAN DIAL INC. AND SPRINT SPECTRUM, L.P.**

Comes now MoKan Dial Inc., (MoKan), Applicant, and hereby files this Request for Approval of an Interconnection Agreement between MoKan and Sprint Spectrum, L.P. (Sprint PCS) pursuant to Section 252(e) of the Telecommunications Act of 1996. In support of this Request, Applicant states the following:

1. MoKan is a Kansas corporation operating as an incumbent local exchange telecommunications company in Missouri. MoKan is in good standing with the Missouri Secretary of State, as demonstrated by the attached certificate of good standing.
2. Sprint Spectrum, L.P., d/b/a Sprint PCS is a commercial mobile radio service provider providing wireless communications services in the state of Missouri.
3. On March 24, 2003, after good faith negotiations, MoKan and Sprint PCS executed a "Wireless Interconnection and Reciprocal Compensation Agreement". This Agreement is attached hereto and incorporated by reference as Attachment A, with its pages sequentially numbered.

4. Pursuant to Section 252(e)(1) of the Act, MoKan hereby submits this Agreement for approval by the Commission. Sprint PCS is a party to the agreement and should be made a party to this proceeding. Sprint PCS can be served with process and made a party hereto by sending the appropriate notice to:

Angela Linares  
Manager—Carrier & Interconnection Management  
6580 Sprint Parkway  
Mailstop: KSOPHW0516  
Overland Park, KS 66251

5. The Agreement complies with Section 252(e) of the Act because the Agreement is consistent with the public interest, convenience and necessity and does not discriminate against any telecommunications carrier not a party thereto.

6. Approval and implementation of the Agreement complies with both Missouri law and Section 252(e) of the Act, effectuates the bilateral agreement between MoKan and Sprint PCS, for which reason MoKan requests that the Commission approve such agreement without change, suspension, or delay.

7. Correspondence, orders, and decisions in this matter should be addressed to:

Donald D. Stowell  
General Manager  
MoKan Dial Inc.  
P.O. Box 429  
112 South Broadway  
Louisburg, KS 66053

and to:

Craig S. Johnson  
Andereck, Evans, Milne, Peace & Johnson, LLC  
700 East Capitol  
P.O. Box 1438

Jefferson City, MO 65102  
Telephone: 573-634-3422  
Facsimile: 573-634-7822  
E-mail: cjohnson@aempj.com

8. This Commission is authorized to review the Agreement and grant the relief requested herein by MoKan pursuant to Section 252(a) of the Act, which provides:

“(a) AGREEMENTS ARRIVED AT THROUGH NEGOTIATION

(1) VOLUNTARY NEGOTIATIONS.—Upon receiving a request for interconnection, services, or network elements pursuant to section 251, an incumbent local exchange carrier may negotiate and enter into a binding agreement with the requesting telecommunications carrier or carriers without regard to the standards set forth in subsections (b) and (c) of section 251. The agreement shall include a detailed schedule of itemized charges for interconnection and each service or network element included in the agreement. The agreement, including any interconnection agreement negotiated before the date of enactment of the Telecommunications Act of 1996, shall be submitted to the State commission under subsection (3) of this section.”

9. Section 252 of the Act provides This Commission with authority to approve the Agreement, and provides it may be rejected if discriminatory to a non-party to the agreement, or is inconsistent with the public interest, convenience, and necessity.

10. MoKan has no pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates that has occurred within three years of the date of this Request for Approval.

11. MoKan has no annual report or assessment fees that is overdue.

WHEREFORE, on the basis of the foregoing, MoKan respectfully requests the Commission to issue an Order that approves the Agreement, and that grants such other relief as is reasonably necessary.

ANDERECK, EVANS, MILNE,  
PEACE & JOHNSON, L.L.C.

By

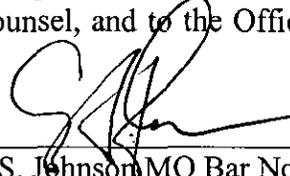


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Facsimile: (573) 634-7822  
Email: CJohnson@AEMPB.com

ATTORNEYS FOR MoKAN DIAL INC.

**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and accurate copy of the foregoing was mailed, via U.S. Mail, postage prepaid, this 14 day of April, 2003, to Sprint PCS Manager of Carrier and Interconnection Management Angela Linares, to Staff General Counsel, and to the Office of the Public Counsel.



Craig S. Johnson MO Bar No. 28179

**VERIFICATION**

I, Donald D. Stowell, General Manager of MoKan Dial Inc., hereby swear and affirm that I am authorized to act on behalf of MoKan Dial Inc., that I have reviewed the statements contained in this request for approval, attest to the veracity of the statements contained therein, and verify that its filing for approval before the Missouri Public Service Commission by Andreck Evans Milne Peace and Johnson, LLC, is an authorized act of the Company.

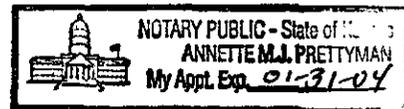
  
Donald D. Stowell

STATE OF KANSAS            )  
                                          ) ss  
COUNTY OF MIAMI        )

I, Annette M J Prettyman a Notary Public do hereby certify that on this 11 day of April, 2003, personally appeared before me Donald D. Stowell, who declared that the information contained herein above is true, to the best of his knowledge and belief.

  
Notary Public

My Commission Expires: Jan 31, 2004



No. F00014013

# STATE OF MISSOURI



Matt Blunt  
Secretary of State

## CORPORATION DIVISION

### CERTIFICATE OF CORPORATE GOOD STANDING - FOREIGN CORPORATION

I, MATT BLUNT, 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

MOKAN DIAL, INC.

using in Missouri the name

MOKAN DIAL, INC.

a KANSAS corporation filed its Evidence of Incorporation with this State on the 27th day of JANUARY, 1961, 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 31st day of MARCH, 2003.

  
Secretary of State

