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ILLINOIS COMMERCE COMMISSION

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

TCG Illinois, TCG Chicago and
TCG St. Louis

Application for Extension of Waiver
of 911 Call Box Requirement under
83 Ill. Admin. Code Sections
725.500(o) and 725.620(b).

No.
00-0174

CHIEF CLERK'S OFFICE

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ILLINOIS
COMMERCE COMMISSION

APPLICATION FOR EXTENSION OF WAIVER

TCG Illinois, TCG Chicago and TCG St. Louis ("Applicants"), by their attorneys, pursuant to Sections 725.500(o) and 725.620(b) of Title 83 of the Illinois Administrative Code, hereby request that the Illinois Commerce Commission ("Commission") grant an extension of the waiver of the requirement that Applicants equip their central offices with call boxes to serve as a part of 911 systems, and the associated call box technical requirements. In support of this Application, the Applicants state as follows:

1. Pursuant to Certificates of Service Authority issued to TCG Illinois, TCG Chicago, and TCG St. Louis in Docket Nos. 97-0099, 97-0100 and 97-0098, Applicants are authorized to provide various local exchange and interexchange telecommunications services in the State of Illinois.
2. Applicants are required by Section 725.500(o) of Title 83 of the Illinois Administrative Code to maintain call boxes as part of the 911 systems. Section 725.620(b) sets forth certain technical requirements with respect to the call boxes.
3. Pursuant to the Order of the Commission in Docket No. 98-0380 issued on January 13, 1999, Applicants received a waiver of the call box requirements of

the above mentioned sections of the Administrative Code as it applies to all of Applicant's switches that serve customers in the state of Illinois.

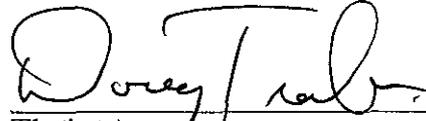
4. Also, pursuant to that order, the Commission directed that Applicants might request an extension of that waiver if the revisions to Part 725 are not completed within one year.
5. The revisions to Part 725 of the Administrative Code have not been completed.
6. Due to the network architecture deployed by competitive local exchange carriers such as the Applicants, it continues to be technologically infeasible for Applicants to comply with these provisions of the Administrative Code.
7. Applicant has complied with the terms of the original waiver.
8. Applicant provides a minimum of two facility paths between its central offices and the 91-1 selective routers, each with a minimum of two trunk group members.
9. Because it is technologically infeasible for Applicants to comply with the call box provisions of the Administrative Code and because Applicants are providing more than adequate 9-1-1 services to end users by utilizing the incumbent local exchange carrier for 911 service, systems and routing, and because Applicants are providing redundancy to enhance the reliability of 911 service, Applicants hereby request that the Commission grant them an extension of the waiver of Section 725.500(o)'s requirements that they maintain call boxes as part of 911 service, and also grant them an extension of the waiver of Section 725.620(b)'s technical requirements with respect to the call boxes, that were granted to them in Docket No. 98-0380.

WHEREFORE, TCG Illinois, TCG Chicago and TCG St. Louis respectfully pray
that the Commission grant them the requested waiver.

Respectfully submitted,

TCG ILLINOIS, TCG CHICAGO AND TCG
ST. LOUIS

By:



Their Attorneys

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Dated: February 21, 2000

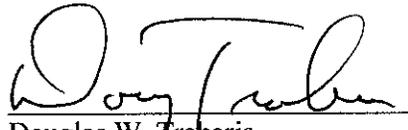
STATE OF ILLINOIS

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TCG Illinois, TCG Chicago and)
TCG St. Louis)
Application for Extension of Waiver of 911) Docket No. _____
Call Box requirement under)
83 Ill. Admin. Code Sections)
725.500(o) and 725.620(b).)

NOTICE OF FILING

PLEASE TAKE NOTICE that we have this 21st day of February 2000, tiled with the Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, a copy of TCG Illinois, TCG Chicago and TCG St. Louis' Application for Extension of Waiver of in the above captioned proceeding.



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