

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Socket Telecom, LLC,)	
)	
Complainant,)	
)	
v.)	Case No. TC-2007-0341
)	
CenturyTel of Missouri, LLC d/b/a)	
CenturTel and Spectra Communications)	
Group, LLC, d/b/a CenturyTel,)	
)	
Respondents.)	

Application for Leave to File a Brief
As Amicus Curiae
Missouri Independent Telephone Company Group,

Come now the Missouri Independent Telephone Company Group¹, hereinafter “MITG”, pursuant to 4 CSR 240-2.075(6), and submit this Application for Leave to file a brief in this matter as *amicus curiae*. In support of this Application, Applicants state as follows:

1. The MITG is comprised of six small rural incumbent local exchange companies, who are also classified as Rural Telephone Companies under the Telecommunications Act of 1996. MITG members provide local, basic local, and exchange access services.

2. The MITG companies are subject to the regulatory supervision of the Missouri Public Service Commission.

¹ Alma Communications Company, Chariton Valley Telephone Corporation, Choctaw Telephone Company, Mid-Missouri (Otelco) Telephone Company, MoKAN Dial Inc., and Northeast Missouri Rural Telephone Company.

3. Copies of all filings in this docket should be directed to the MITG by serving:

Craig S. Johnson
Mo Bar # 28179
1648-A East Elm St.
Jefferson City, MO 65101
(573) 632-1900
(573) 634-6018 (fax)
craig@csjohnsonlaw.com

4. The MITG has reviewed the Complaint, Answer, Scheduling Order, direct testimony of Socket, and the rebuttal testimony of CenturyTel.

5. Like Socket and CenturyTel in this complaint proceeding, the MITG companies have indirect interconnections with other carriers by which traffic is terminated to them, or exchanged with them. In general, the MITG companies have no direct local interconnections with competitors, who instead rely upon indirect interconnections through AT&T.

6. Before the FCC and before this Commission, the MITG companies have opposed any requirement to be financially responsible to transport traffic outside their local calling areas to a competitor's indirect interconnection point with another ILEC such as AT&T. The MITG companies oppose any such requirement whether it is referred to as "LNP", a "virtual NXX", or a porting request that is in effect prohibited location portability. The MITG companies oppose any obligation to port a local number to a CLEC or CMRS provider which has no local interconnection with a MITG Company, as the end result can be the same. The MITG companies oppose any requirement to transport a local call outside an MITG company's local service area.

7. Applicants are interested in the issue(s) raised by the direct and rebuttal testimony in this case. Whenever in any exchange CLECs do not maintain local direct interconnections for exchanging traffic between customers located within that exchange, issues will arise as to obligations to port numbers, obligations to transport calls, and with respect to intercarrier compensation. Whenever in any exchange a CLEC succeeds in effectuating a local ported number for a customer that is not physically located in that exchange, these issues will be exacerbated.

8. These issues are relevant to this case. No carrier operates in a vacuum. The outcome of this case between Socket and CenturyTel may have an impact on other carriers, in particular other local competitors. Granting this Application is in the public interest.

9. The MITG companies at this point are opposed to the complaint raised by Socket, and believe they are supportive of the position of CenturyTel herein.

10. The MITG Companies respectfully request that they be granted leave to file a brief as amicus herein, either on July 3, 2007 when position statements are due, or, preferably if there is a briefing schedule imposed after evidentiary hearing, then at the time initial briefs are due from the parties. The MITG Companies understand the Commission may limit them to a single brief, unless otherwise ordered.

/s/ Craig S. Johnson
Craig S. Johnson, Atty.
Mo Bar # 28179
1648-A East Elm St.
Jefferson City, MO 65101
(573) 632-1900
(573) 634-6018 (fax)

craig@csjohnsonlaw.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was electronically mailed to the following attorneys of record in this proceeding this 8th day of June, 2007:

/s/ Craig S. Johnson
Craig S. Johnson