

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

SOUTHWESTERN BELL TELEPHONE, L.P.)	
D/B/A SBC MISSOURI'S PETITION FOR)	
COMPUSORY ARBITRATION OF)	Case No. TO-2005-0336
UNRESOLVED ISSUES FOR A SUCCESSOR)	
AGREEMENT TO THE MISSOURI 271)	
AGREEMENT ("M2A"))	

**RESPONSE OF ICG TELECOM GROUP, INC. TO
SBC MISSOURI'S PETITION FOR ARBITRATION**

COMES NOW ICG TELECOM GROUP, INC. ("ICG") and files its Response to the Petition for Arbitration and Motion for Issuance of Order of Notification, filed by Southwestern Bell Telephone, L.P. d/b/a SBC Missouri ("SBC") on March 31, 2005. ICG states that it has requested a Memorandum of Understanding with SBC Missouri in which ICG will indicate that it does not intend to engage in bilateral negotiations to develop a successor agreement or to participate in arbitration proceedings. Pursuant to the Memorandum of Understanding that ICG expects to sign, ICG will agree to adopt, pursuant to Section 252(i) of the Federal Telecommunications Act, one of the successor agreements resulting from this arbitration.

ICG submits that it should be included on the list of companies on SBC's Exhibit 2, which identifies companies that signed and submitted a Memorandum of Understanding to SBC Missouri. At such time as ICG signs and submits to SBC Missouri the Memorandum of Understanding, ICG will file a copy of the document in this docket.

Respectfully submitted,

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/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the forgoing was served this 27th day of April, 2005, by email or by placing same in the U.S. Mail postage paid, to the persons listed on the attached service list.

/s/ Carl J. Lumley

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