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August 8, 2005

FILED²

AUG 08 2005

Missouri Public
Service Commission

The Honorable Colleen M. Dale
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Re: Complaint of FullTel, Inc. for Enforcement of Interconnection Obligations of CenturyTel of Missouri, LLC

Dear Judge Dale:

Enclosed for filing in the referenced matter please find the original and five copies of a Complaint for Enforcement of Interconnection Obligations and Motion for Expedited Treatment.

A complimentary copy of this filing has been sent to Larry Dority, who has been the attorney for CenturyTel of Missouri, LLC in past dockets.

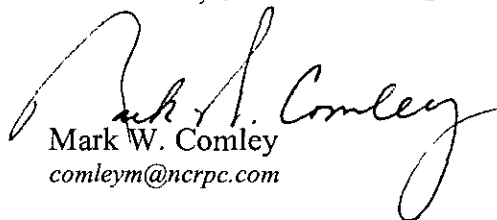
Would you please bring this filing to the attention of the appropriate Commission personnel.

Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
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MWC:ab

Enclosure

cc: Office of Public Counsel
General Counsel's Office
Andrew M. Klein
Larry Dority

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

FILED²

AUG 08 2005

**Missouri Public
Service Commission**

Complaint of FullTel, Inc., for Enforcement)
of Interconnection Obligations of CenturyTel)
of Missouri, LLC)

Case No. _____

MOTION FOR EXPEDITED TREATMENT

FullTel, Inc. ("FullTel"), pursuant to 4 CSR 240-2.080(16), for its Motion for Expedited Treatment to the Missouri Public Service Commission ("Commission"), states the following:

1. FullTel is a new entrant into the Southwest Missouri market who seeks to compete with CenturyTel and its ISP affiliate, CenturyTel.net, for the provision of broadband and voice services. FullTel's efforts to date have, however, been thwarted by CenturyTel's anticompetitive actions, and FullTel is therefore filing a Complaint, herewith, to compel CenturyTel to provide interconnection as required by applicable law and the terms of the parties' approved interconnection agreement.

2. FullTel seeks, in the accompanying Complaint, an order requiring Respondent CenturyTel to implement the Interconnection Agreement, interconnect its network and exchange traffic under lawful terms, cease its delay tactics, and adhere to applicable law, so that FullTel may provide a competitive alternative to Missouri consumers.

3. FullTel seeks to provide service in the Missouri market as soon as possible, but unfortunately cannot do so until the Commission orders CenturyTel to act in accordance with the law. It is for that reason that FullTel files this Motion for Expedited Treatment – so that FullTel may compete in the marketplace without further undue delay.

4. Despite the fact that FullTel informed CenturyTel, on April 12, 2005, that FullTel would establish a point of interconnection with CenturyTel at the latter's central office in

Branson, that POI has yet to be established. Rather, through a series of delay tactics, CenturyTel has denied FullTel its lawful right and has denied consumers further competitive choice.

5. First, CenturyTel insisted that FullTel provide a forecast and "CLEC profile," before even scheduling an implementation meeting. However, even after those items were duly submitted, CenturyTel failed to schedule an implementation meeting for over a month.

6. CenturyTel then rejected FullTel's lawful collocation request, even when FullTel suggested virtual collocation as an alternative, to address an ostensible lack of space issue. It was only after FullTel notified commission staff that CenturyTel suddenly determined that it could accommodate the collocation request.

7. CenturyTel next, however, asserted that the traffic to be exchanged between the parties would not be considered "local" and that the interconnection requested by FullTel is somehow outside the scope of the parties' Interconnection Agreement. CenturyTel also rejected FullTel's request for a single POI in Branson, demanding instead that FullTel establish multiple POIs – in each individual town. Despite efforts to resolve these issues outside of the regulatory arena, these CenturyTel-created roadblocks have proven insurmountable, and FullTel was forced to file the accompanying Complaint.

8. Each day that passes is an additional affront to FullTel's lawful right to compete, and an additional day that consumers are deprived of an additional competitor and the benefits attendant therewith. In order for FullTel to interconnect and compete for customers, CenturyTel must follow the law, and must provide some minimal level of good faith cooperation. FullTel respectfully requests the Commission's assistance in that regard and, due to the serious delays already encountered, respectfully requests that the Commission act expeditiously in granting the requested relief.

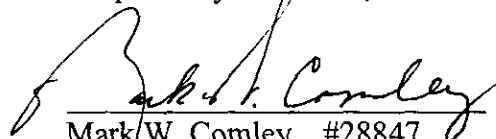
9. FullTel's prospective customers will greatly benefit by the Commission's expeditious treatment of the complaint. Moreover, there will be a positive impact on the general public in that interconnection with CenturyTel will widen the field of competition. No negative effects are anticipated either upon the complainant, its future customers or the public if the Commission accelerates its procedures and gives expedited consideration to this complaint.

WHEREFORE, FullTel respectfully requests that the Commission grant its Motion for Expedited Treatment and act expeditiously in granting the relief requested in the accompanying Complaint. Specifically, Fulltel requests the Commission to:

- a) Shorten the time within which CenturyTel may answer the complaint to fifteen days;
- b) Immediately direct the Staff of the Commission to investigate the allegations of the complaint and file its report on or about September 8, 2005; and
- c) Adopt a procedural schedule in this matter by which hearing (to the extent it may be necessary) shall be concluded on Friday, September 16, 2005 and an order of the Commission issued by Friday, September 23, 2005 in which CenturyTel is compelled to provide interconnection and comply with its obligations without further delay.

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Respectfully submitted,



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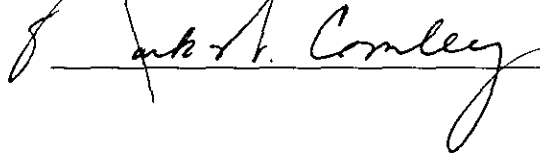
Counsel to FullTel, Inc.

Dated: August 5, 2005

*Not admitted to practice in the State of Missouri

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 8th day of August, 2005, to General Counsel's Office at gencounsel@psc.mo.gov; and Office of Public Counsel at opcservice@ded.mo.gov.

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