

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

<b>PETITION OF SOCKET TELECOM, LLC</b>	)	
<b>FOR COMPULSORY ARBITRATION OF</b>	)	
<b>INTERCONNECTION AGREEMENTS WITH</b>	)	<b>CASE NO. TO-2006-0299</b>
<b>CENTURYTEL OF MISSOURI, LLC AND</b>	)	
<b>SPECTRA COMMUNICATIONS, LLC</b>	)	
<b>PURSUANT TO SECTION 252(b)(1) OF THE</b>	)	
<b>TELECOMMUNICATIONS ACT OF 1996.</b>	)	

**MOTION FOR LEAVE TO FILE ERRATA TO PETITION**  
**FOR ARBITRATION OF SOCKET TELECOM, LLC**

COMES NOW Socket Telecom, LLC (“Socket”), pursuant to 4 CSR 240-2.080(20) and other applicable law, and for its Motion for Leave to file the attached Errata to its Petition for Arbitration respectfully states to the Commission as follows:

1. Socket filed its Petition for Arbitration of interconnection agreements with CenturyTel of Missouri, LLC and Spectra Communications, LLC, (collectively, “CenturyTel”) on January 13, 2006. Included in that Petition were 19 attachments or appendices with contract language concerning different subjects of the proposed interconnection agreements, and 18 decision point lists (“DPLs”) associated with the attachments. Socket just discovered that one such DPL, that covering Article III, was inadvertently incomplete as filed, and omitted the final 11 pages. Socket requests the Commission grant leave for Socket to substitute the complete copy of the Article III DPL, attached as Exhibit A, for the Article III DPL in its original filing.

2. The contract language, including disputed language for both Socket and CenturyTel, are set out in full in the originally-filed Article III attachment. Consequently, CenturyTel has been on notice since the initiation of this arbitration concerning all of the competing language proposed by itself and by Socket. Further, CenturyTel has yet to file its

Response to the Petition. Therefore, CenturyTel will not be prejudiced if the Commission now substitutes the correct Article III DPL for the truncated version previously filed in error.

3. The DPLs summarizing the issues in this proceeding are expected to change during the course of the arbitration. Socket's Petition noted that it expects CenturyTel to modify its position statements when it files its Response, and add additional issues it believes are appropriate. Consequently, Socket may also need to modify its positions before the final DPLs are presented to the arbitrator for hearing. In addition, the Parties are continuing to negotiate issues and are attempting to resolve some of the issues. As a result, some of the issues may be removed from the DPLs altogether. Because these DPLs are a "work in progress," there is further reason to permit this errata filing, correcting the initial filing of the Article III DPL.

WHEREFORE, Socket respectfully requests the Commission grant leave for Socket to file the attached complete Article III DPL.

Respectfully submitted,

CURTIS, HEINZ,  
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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ATTORNEYS FOR SOCKET TELECOM, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at [gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)), the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)) and counsel for CenturyTel Missouri and Spectra (at [lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)), on this the 31st day of January, 2006.

/s/ Carl J. Lumley

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**EXHIBIT A**

**ARTICLE III DPL**