

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

<b>APPLICATION OF ICG TELECOM</b>	)	
<b>GROUP, INC. FOR APPROVAL OF</b>	)	
<b>AMENDMENTS TO ITS M2A</b>	)	
<b>INTERCONNECTION AGREEMENT</b>	)	
<b>WITH SOUTHWESTERN BELL</b>	)	<b>CASE NO. CK-2004-0200</b>
<b>TELEPHONE COMPANY PURSUANT</b>	)	
<b>TO § 252(e) OF THE</b>	)	
<b>TELECOMMUNICATIONS</b>	)	
<b>ACT OF 1996</b>	)	

**ICG TELECOM GROUP, INC.'S**  
**MOTION FOR RECONSIDERATION**

COMES NOW ICG Telecom Group, Inc. (ICG) and for its Motion for Reconsideration pursuant to 4 CSR 240-2.160, states as follows:

1. On or about December 19, 2003, the Commission issued an order directing ICG to submit a copy of "the Agreement as amended" to the Data Center of the Missouri Public Service Commission with the pages sequentially numbered no later than December 29, 2003.

2. ICG adopted the M2A Interconnection Agreement. SBC and ICG have not created an amended version of the M2A. To do so would be extremely burdensome. Rather, the parties negotiated "free standing" amendments. Therefore, a complete copy of the M2A Interconnection Agreement as amended is not available at this time.

WHEREFORE, ICG respectfully requests that the Commission issue an Order exempting it from filing a complete copy of the M2A Interconnection Agreement as amended and the Commission accept in its place the amendments as filed with the Commission as part of the Application in this proceeding.

Respectfully submitted,

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

/s/ Carl J. Lumley

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ATTORNEYS FOR ICG TELECOM GROUP, INC.

**Certificate of Service**

A true and correct copy of the foregoing was mailed this 23rd day of December, 2003, by placing same in the U.S. Mail, postage paid to:

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