

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

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

MOTION FOR LEAVE TO FILE
REVISED DIRECT TESTIMONY OF STEVEN E. TURNER

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 Revised Direct Testimony of Steven E. Turner, respectfully states to the Commission as follows:

1. Socket filed its direct testimony in this proceeding in a timely manner on March 21, 2006, pursuant to the procedural schedule, and served all parties prior to close of business on that date. Included in that filing were the Direct Testimony of Steven E. Turner, as well as direct testimony for three other Socket witnesses. Socket then discovered that the testimony of Mr. Turner was inadvertently incomplete as filed, and omitted a discussion of the single remaining contested issue in Article XII Number Portability. Socket requests the Commission grant leave for Socket to file the Revised Direct Testimony of Steven E. Turner as a substitution for Mr. Turner’s Direct Testimony filed on March 21, 2006.

2. For the convenience of all affected parties, Socket is providing the attached revised confidential and redacted versions of Mr. Turner’s Direct Testimony, rather than filing a shorter Supplemental Direct Testimony. In this way, parties may simply discard the prior copy

of Mr. Turner's testimony and substitute the attached. In each piece of testimony the following changes have been made:

- a. Addition of Section VII to the Table of Contents
- b. Addition of reference to this issue in the list of topics discussed (p. 2, l. 19).
- c. Addition of actual testimony on the issue (pp. 60, l. 17- 62, l. 27).

3. As soon as Socket became aware of its omission, it promptly filed this Motion for Leave, along with the Revised Testimony. Because this filing is only three days following the scheduled filing of direct testimony and because the changes are so brief, CenturyTel still has ample opportunity to develop rebuttal testimony on the single new issue that the Revised Testimony covers. If CenturyTel needs more time, however, Socket will not oppose a two working-day extension for CenturyTel rebuttal testimony on the single number portability issue.

WHEREFORE, Socket respectfully requests the Commission grant leave for Socket to file the attached Revised Direct Testimony of Steven E. Turner.

Respectfully submitted,

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

/s/ Leland B. Curtis

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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), the Office of Public Counsel (at opcservice@ded.mo.gov), and counsel for CenturyTel Missouri and Spectra (at ldwidity@sprintmail.com and david.brown@hughesluce.com), on this the 24th day of March, 2006.

/s/ Leland B. Curtis
