

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"))

MOTION TO ACCEPT LATE FILED
RESPONSE

COMES NOW ICG Telecom Group, Inc. ("ICG") pursuant to 4 CSR 240-2.050 and hereby requests that the Commission grant its Motion to Accept Late Filed Response.

1. On or about April 6, 2005, the Commission issued its Order directing that Responses in the above-styled proceeding be filed on April 25, 2005. ICG was not able to meet this deadline due to a breakdown in communications.

2. ICG does not believe that this short delay in the filing of its Response will prejudice any party, since ICG has requested a Memorandum of Understanding with SBC Missouri indicating that it does not intend to engage in bilateral negotiations to develop a successor agreement or to participate in the arbitration proceeding.

WHEREFORE, ICG requests that the Commission grant its Motion to Late File its Response.

Respectfully submitted,

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

Carl J. Lumley, #32869
Leland B. Curtis, #20550
130 S. Bemiston, Suite 200
St. Louis, Missouri 63105
(314) 725-8788
(314) 725-8789 (FAX)
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

Attorneys for ICG Telecom Group, Inc.

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

Dana K. Joyce
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
gencounsel@psc.mo.gov

John B. Coffman
Office of Public Counsel
P.O. Box 2230
Jefferson City, Missouri 65102
opcservice@ded.mo.gov

Nathan Williams
Missouri Public Service Commission
P.O. Box 360
200 Madison, Suite 800
Jefferson City, MO 65102
Nathan.Williams@psc.mo.gov

Mark Comley
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
comleyM@ncrpc.com

Leo Bub
Legal Department
Southwestern Bell Telephone Co., L.P.
d/b/a SBC Missouri
One Bell Center, Room 3520
St. Louis, Missouri 63101
leo.bu@sbc.com

Brett D. Leopold
Sprint
6450 Sprint Parkway
Mail Stop KSOPHN0212-2A218
Overland Park, KS 66251
Brett.D.Leopold@mail.sprint.com

Karl Zobrist
Mark Johnson
Sonnenschein, Nath & Rosenthal, LLC
4520 Main Street, Suite 1100
Kansas City, MO 64111
kzobrist@sonnenschein.com
mjohnson@sonnenschein.com

Legal Department
Wiltel Local Network, LLC
One Technology Center TC-151
Tulsa, OK 74103

Kevin Thompson, Deputy Chief
Regulatory Law Judge and Arbitrator
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102
Kevin.thompson@psc.mo.gov

Bill Magness
98 San Jacinto Blvd., Ste 1400
Austin, TX 78701
bmagness@phonelaw.com

Stephen F. Morris
MC WorldCom Communications, Inc.
MCImetro Access Transmission Services, LLC
701 Braozs, Suite 600
Austin, TX 78701
stephen.morris@mci.com