## BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

APPLICATION OF SOCKET TELECOM,	)	
LLC AND CENTURYTEL OF	)	
MISSOURI, LLC FOR APPROVAL OF	)	
AN AMENDMENT TO THEIR	)	
INTERCONNECTION AGREEMENT	)	CASE NO. TK-2006-0175
PURSUANT TO § 252(e) OF THE	)	
TELECOMMUNICATIONS	)	
ACT OF 1996	)	
	)	

## MOTION TO CONSOLIDATE

COME NOW Socket Telecom, LLC ("Socket") and CenturyTel of Missouri, LLC ("CenturyTel"), pursuant to 4 CSR 240-2.110(3) and for their Motion to Consolidate state to the Commission as follows:

- 1. Socket and CenturyTel have herein applied for expedited approval of an amendment to interconnection agreement, in connection with a settlement of federal litigation.
- 2. Socket and Spectra Communications Group, LLC ("Spectra") have contemporaneously applied for expedited approval of an interim arrangement that is similar in content to the amendment to interconnection agreement that is the subject of this proceeding. The Socket and Spectra application has been assigned Case No. TK-2006-0176.
- 3. Rule 4 CSR 240-2.110(3) provides that "when pending actions involve related questions of law or fact, the commission may order a joint hearing of any or all the matters at issue, and may make other orders concerning cases before it to avoid unnecessary costs or delay."
- 4. The applications filed by Socket, CenturyTel and Spectra concern the same subject matter and involve the same issues of fact and law. It will be more efficient for all parties

and the Commission to consolidate these actions and hold joint proceedings. Consolidation will avoid unnecessary costs and delay.

WHEREFORE, Socket and CenturyTel respectfully request the Commission to consolidate this case with Case No. TK-2006-0176.

Respectfully submitted,

/s/ Carl J. Lumley

Carl J. Lumley MBE 32869 Leland B. Curtis MBE 20550 Curtis, Heinz, Garrett & O'Keefe, PC 130 S. Bemiston, Suite 200 Clayton, Missouri 63105

Telephone: (314) 725-8788 Facsimile: (314) 725-8789

Email: clumley@lawfirmemail.com

lcurtis@lawfirmemail.com

ATTORNEYS FOR SOCKET TELECOM, LLC

## FISCHER & DORITY

/s/ Larry W. Dority (By Carl J. Lumley)

Larry W. Dority, #25617 101 Madison, Suite 400 Jefferson City, Missouri 65101 573-636-6758 573-637-0383 (FAX) lwdority@sprintmail.com

ATTORNEYS FOR CENTURYTEL OF MISSOURI, LLC

## CERTIFICATE OF SERVICE

I hereby certify that	a true and correct	copy of this	document w	as served ι	ipon the
parties listed below on this	18th day of Octob	er, 2005 by ea	mail or by p	olacing sam	e in the
U.S. Mail, postage prepaid.					

/s/ Carl J. Lumley	
Carl J. Lumley	

Office of the Public Counsel PO Box 7800 Jefferson City, Missouri 65102

Office of General Counsel Missouri Public Service Commission PO Box 360 Jefferson City, Missouri 65102