

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Staff of the Public Service Commission of the)	
State of Missouri,)	
)	
Complainant,)	<u>Case No. TC-2007-0111</u>
)	
v.)	
)	
Comcast IP Phone, LLC)	

**PETITION FOR LEAVE TO FILE *AMICUS* COMMENTS
IN OPPOSITION OF DISMISSAL**

COMES NOW the Missouri Cable Telecommunications Association, pursuant to Commission Rule 4 CSR 240-2.075 and for its Petition to seek amicus standing in the above captioned matter states to the Missouri Public Service Commission (Commission or PSC) as follows:

1. The Missouri Cable Telecommunications Association (MCTA) is a 501 (c) (6) non-for-profit organization existing as a trade association for the cable telecommunications industry in the state of Missouri. It has 22 cable operator member companies and 42 associate member companies which serve approximately one million subscribers in the state of Missouri. Its members are attached hereto as Exhibits 1 and 2.
2. The issues raised by this case are important to the public and uniquely to the cable telecommunications industry in the state of Missouri and nationwide. These issues are presently being examined by the Federal Communications Commission (FCC) and are also the subject of legislation before the Missouri General Assembly.
3. Accordingly, MCTA member companies and their subscribers have a vital interest in the subject matter of this proceeding and are so situated that the disposition of

this action may, as a practical matter, impair or impede their ability to protect their business and competitive interests and the interests of their subscribers in this matter.

4. MCTA would agree to accept this case in its present status and will limit its participation to joining other parties which have filed a Motion for Continuance pending a legislative evaluation of the issues inherent in this proceeding.

WHEREFORE, MCTA respectfully requests that the Commission for good cause grant leave to intervene with amicus status in order to join in a Motion for Continuance as stated above.

Respectfully submitted,

HENDREN ANDRAE, LLC

/s/

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**ATTORNEYS FOR MISSOURI CABLE
TELECOMMUNICATIONS
ASSOCIATION**

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed, served electronically, or hand-delivered, this 18th day of April, 2007, to:

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EXHIBIT 1

Cable Operator Members
Allegiance Communications
Boycorn Cablevision, Inc.
Cable America Corporation
Cable ONE, Inc.
Chariton Valley Comm. Corp.
Charter Communications, Inc.
City Cable
City of Unionville CATV
Comcast Cable
Fidelity Cablevision, Inc.
Green Hills Communications, Inc.
Houston Cable TV
Kahoka Communications
LongView Communications
Mediacom
NewWave Communications
Rapid Communications
SEMO Communications, Inc.
South Holt Cablevision, Inc.
St. Joseph Cablevision
Suddenlink Communications
Time Warner Cable
TOTAL
of MO Subscribers
22 Cable Operator Member Companies

2007 Associate Members

Associate Member Companies
A&E Television Networks
Adams Global
ARCOM Labs
Bloomberg Television
C-COR.net Corporation
Comcast Networks
Communique, Inc.
Court TV
Credit Protection Association
C-SPAN
Daystar Television Network
Discovery Networks
FOX Cable
Fuse Networks
Game Show Network
Hallmark Channels
Harmonic
Integrity Communications
Lifetime Entertainment Services
MetaSwitch
MTV Networks
Olympusat, Inc.
Oxygen Media, Inc.
Playboy Television Networks
ReelzChannel
Renegade Productions
Scripps Networks
System Services Broadband, Inc.
The CMI Group
The Inspiration Networks (INSP)
The Outdoor Channel
The Sportsman Channel
The Tennis Channel
The Weather Channel
Thomas & Betts Corporation
TOA Technologies
Turner Networks
TV Guide
TV One, LLC
Univision Networks
Vvyo/Xtend Networks
Wealth TV

There are 42 Associate Member Companies