

**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 SUPPORT OF CONTINUANCE**

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
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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 19th day of April, 2007, to:

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