

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)	

**SOCKET TELECOM, LLC'S REPLY TO CENTURYTEL'S RESPONSE TO
SOCKET'S MOTION FOR RECUSAL OF COMMISSIONER APPLING**

COMES NOW Socket Telecom, LLC ("Socket") and files its Reply to CenturyTel's Response to CenturyTel's Motion for the Recusal of Commissioner Appling from deliberations and voting on Socket's pending Motion for Reconsideration and any other Commission decisions remaining in this case, and for cause, shows as follows:

1. Socket Telecom, LLC's ("Socket") Motion for Reconsideration is on the agenda for consideration by the Commission at its July 20, 2006, meeting.
2. On July 19, 2006, 2006, Socket filed its Motion for Recusal of Commissioner Appling.
3. On July 19, 2006, CenturyTel filed its Response to Socket Telecom, LLC's Motion for Recusal ("CenturyTel's Response"). In CenturyTel's Response, CenturyTel argues that the Commission does not have jurisdiction to alter its decision, or to make any additional decisions in this arbitration. CenturyTel's position is incorrect. The parties have, on several occasions, extended the deadlines associated with this case. The latest Order Granting Extension is not as limited as CenturyTel claims. The Commission has not yet considered or approved the conformed interconnection agreement between Socket and CenturyTel as required by Section 252 of the Federal Act. The Commission retains jurisdiction over this arbitration because the

parties have agreed to extend the time to permit the Commission to review and approve the conformed agreements.

3. It is Socket's position that the Commission has jurisdiction to consider Socket's Motion to Reconsider, which was timely filed on June 28, 2006, the day after the Commission issued its Final Commission Decision. To the extent the Commission determines it is necessary, Socket agrees to any waiver of the rules the Commission deems appropriate to allow the Commission to act on Socket's Motion for Reconsideration.

Respectfully submitted,

CURTIS, HEINZ,
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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 foregoing 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), counsel for CenturyTel of Missouri and Spectra Communications (at ldority@sprintmail.com and at hartlef@hughesluce.com) on this 20th day of July, 2006.

/s/ Carl Lumley _____