

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

<b>PETITION OF SOCKET TELECOM, LLC</b>	)	
<b>FOR COMPULSORY ARBITRATION OF</b>	)	
<b>INTERCONNECTION AGREEMENTS WITH</b>	)	<b>CASE NO. TO-2006-0299</b>
<b>CENTURYTEL OF MISSOURI, LLC AND</b>	)	
<b>SPECTRA COMMUNICATIONS, LLC</b>	)	
<b>PURSUANT TO SECTION 252(b)(1) OF THE</b>	)	
<b>TELECOMMUNICATIONS ACT OF 1996</b>	)	

**SOCKET TELECOM, LLC’S RESPONSE TO CENTURYTEL’S  
MOTION TO STRIKE SOCKET’S MOTION FOR RECONSIDERATION**

COMES NOW Socket Telecom, LLC (“Socket”), pursuant to 4 CSR 240-2.080(15) and files its Response to CenturyTel’s Motion to Strike Socket’s Motion for Reconsideration (the “Motion to Strike”), and respectfully states as follows:

On June 9, 2006, the Regulatory Law Judge issued an Order requiring CenturyTel of Missouri, LLC (“CenturyTel”) to “file a pleading setting out its access line-to-trunk ratio for each of its exchanges” (“Order Requiring Filing”). On June 13, 2006, Socket filed its Motion for Reconsideration requesting that the Commission reconsider and withdraw the Order Requiring Filing and the data request to CenturyTel. On June 14, 2006, the Regulatory Law Judge issued an Order granting Socket’s Motion for Reconsideration (“Order Granting Motion”), withdrawing the Order Requiring Filing and directing CenturyTel not to file a pleading in compliance with the Order Requiring Filing.

On June 19, 2006, CenturyTel filed its Motion to Strike, stating that it was compelled to demonstrate that the Commission should strike Socket’s Motion for Reconsideration and “stay the course” with respect to the resolution of the POI dispute.<sup>1</sup> CenturyTel’s pleading was critical of Socket’s Motion for Reconsideration and requested that the Commission strike Socket’s Motion for Reconsideration.

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<sup>1</sup> CenturyTel’s Motion to Strike Socket’s Motion for Reconsideration at 1.

Socket opposes CenturyTel's Motion to Strike, which is moot because the Regulatory Law Judge already has issued an Order granting Socket's Motion for Reconsideration. Moreover, CenturyTel failed to comply with 4 CSR 240-2.080(3), which requires each pleading to state a clear and concise statement of the statutory provision or other authority under which relief is requested. Socket is not aware that any authority exists for the Commission to strike Socket's Motion for Reconsideration. There was a sound basis for the Regulatory Law Judge to issue the Order Granting Motion; it should not be withdrawn.

**WHEREFORE,** Socket respectfully requests that the Commission deny CenturyTel's Motion to Strike Socket's Motion for Reconsideration.

Respectfully submitted,

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

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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](mailto:gencounsel@psc.mo.gov)), the Office of Public Counsel (at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)), counsel for CenturyTel of Missouri and Spectra Communications (at [ldority@sprintmail.com](mailto:ldority@sprintmail.com) and at [hartlef@hughesluce.com](mailto:hartlef@hughesluce.com)) on this 21st day of June, 2006.

/s/ Carl Lumley \_\_\_\_\_