

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

|                                                    |   |                                     |
|----------------------------------------------------|---|-------------------------------------|
| Socket Telecom, LLC,                               | ) |                                     |
|                                                    | ) |                                     |
| Complainant,                                       | ) |                                     |
|                                                    | ) |                                     |
| v.                                                 | ) | <b><u>Case No. TC-2007-0341</u></b> |
|                                                    | ) |                                     |
| CenturyTel of Missouri, LLC d/b/a CenturyTel and   | ) |                                     |
| Spectra Communications Group, LLC d/b/a CenturyTel | ) |                                     |
|                                                    | ) |                                     |
| Respondent                                         | ) |                                     |

**PETITION FOR LEAVE TO FILE *AMICUS* BRIEF**

COMES NOW the Small Telephone Company Group,<sup>1</sup> pursuant to Rule 4 CSR 240-2.075(6) and for its Petition for leave to file its amicus brief in this matter, states to the Missouri Public Service Commission (Commission or PSC) as follows:

1. The STCG member companies are all small incumbent local exchange telephone companies (ILECs) as defined by Missouri law and provide telecommunications service in the rural areas of the state under the regulation of the PSC. The STCG companies provide basic local exchange service to subscribers within one or more Commission-defined exchanges in the state of Missouri. The STCG companies are “telecommunications companies” and “public utilities” as those terms are defined by §386.020 RSMo. and are therefore subject to the jurisdiction, regulation and control of the Commission as provided by law. The STCG companies are also “small incumbent local exchange carriers” as defined by §386.020(30) RSMo.

2. The issues of geographic/location portability and “virtual NXX” raised by this case are important to the public and to the telecommunications industry in Missouri

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<sup>1</sup> See Attachment A.

and nationwide. These issues are presently being examined by the Federal Communications Commission (FCC).

3. Accordingly, the STCG member companies have an 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 interests. In addition, the STCG has a unique history and perspective on this matter. Therefore, it is in the public interest for the PSC to allow the STCG to file the attached *amicus* brief.

WHEREFORE, the STCG respectfully requests that the Commission grant leave for the STCG to file the *Amicus Curiae* brief that is being submitted simultaneously.

Respectfully submitted,

**/s/ Brian T. McCartney**

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### **Certificate of Service**

I hereby certify that a true and correct copy of this document was mailed, served electronically, or hand-delivered, this 10<sup>th</sup> day of September, 2007, to:

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**/s/ Brian T. McCartney**

## **ATTACHMENT A**

BPS Telephone Company  
Citizens Telephone Company  
Craw-Kan Telephone  
Ellington Telephone  
Goodman Telephone Company  
Grand River Mutual Telephone Corporation  
Green Hills Telephone Corporation  
Kingdom Telephone Company  
LeRu Telephone Company  
McDonald County Telephone Company  
New London Telephone Company  
Orchard Farm Telephone Company  
Oregon Farmers Mutual Telephone Company  
Ozark Telephone Company  
Peace Valley Telephone Company, Inc.  
Seneca Telephone Company  
Stoutland Telephone Company