

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of CenturyTel of Missouri, LLC)	
d/b/a CenturyTel and Spectra Communications)	Case No. TC-2007-0307
Group, LLC d/b/a CenturyTel Tariff Filings to)	
Grandfather Remote Call Forward Services)	Tariff Nos. JI-2007-0498
To Existing Customers and Existing Locations)	JI-2007-0499

POSITION STATEMENT OF SOCKET TELECOM AND SOCKET INTERNET

Come Now Socket Telecom, LLC and Socket Internet pursuant to Commission order and for their Position Statement state to the Commission as follows:

Issue 1. Should the Commission approve CenturyTel of Missouri, LLC's and Spectra Communications Group, LLC d/b/a CenturyTel's (collectively "CenturyTel") tariff filings to grandfather Remote Call Forward ("RCF") service to existing customers and existing locations?

Socket Telecom/Socket Internet Position:

The Commission should reject CenturyTel's tariff filings to grandfather RCF service. It is not in the public interest for an incumbent like CenturyTel to cease providing a standard service offering like RCF service, particularly under the current circumstances.

CenturyTel's only reason for seeking to grandfather RCF service, and thereby impose inconvenience and hardship on the public, is that it is dissatisfied with the outcome of its recent arbitration with Socket Telecom. In the arbitration, the Commission ordered CenturyTel to port telephone numbers of customers that have subscribed to its RCF service and decide to switch to Socket Telecom as their provider. (Interconnection Agreement, Article VXII, Section 6.2.1). CenturyTel improperly seeks to trump the Commission's decision by grandfathering RCF service to limit the number of customers who would have this choice.

CenturyTel's efforts to impair consumer choice and competition in this manner are particularly misguided, as the only ultimate impact would be that Socket Internet and other customers would have to get new telephone numbers, instead of being able to keep their current numbers, when they change providers to Socket Telecom and subscribe to its foreign exchange service. The general public would then unnecessarily suffer the consequences of the confusion that can attend the introduction of new telephone numbers in rural communities where folks better recognize the local numbers that have been used in the past. In short, CenturyTel ultimately gains nothing and the public suffers.

For these reasons, the Commission should reject the proposed tariffs.

Issue 2. Should the Commission require CenturyTel to fulfill Socket Internet's orders for RCF service submitted after the tariff filings, before being allowed to grandfather that service?

Socket Telecom/Socket Internet Position:

The Commission should require CenturyTel to fulfill Socket Internet's pending orders for RCF service. Socket Internet submitted valid orders prior to CenturyTel's proposed effective date for grandfathering the service. CenturyTel is legally required to honor its tariffs and fulfill these orders.

Contrary to CenturyTel's false contentions, Socket Internet has and will fully comply with CenturyTel's tariffs while it is a CenturyTel customer subject to those tariffs, including fulfilling the financial obligations of the applicable term commitment. In fact, CenturyTel admits as much, as it has indicated that it would fulfill the orders if Socket Internet would commit not to change local service providers. But CenturyTel has no right to request such

a commitment or otherwise hold Socket Internet hostage. Moreover, contrary to CenturyTel's efforts to confuse the Commission, CenturyTel's tariffs have no application after Socket Internet has ported a number and is being served by Socket Telecom.

The Commission has ordered CenturyTel to port RCF telephone numbers under such circumstances (Interconnection Agreement, Article VXII, Section 6.2.1), in recognition that the customers are entitled to keep their numbers. Notwithstanding CenturyTel's false contentions about purported network issues, everything that occurs subsequent to such ports is totally irrelevant to CenturyTel's obligation to fulfill RCF orders under its currently effective tariffs. Indeed, other than the involved telephone numbers, everything else remains the same whether ports occur or new numbers are assigned when changes in carriers occur.

The Commission should require CenturyTel to fulfill its obligations under its effective tariffs and provision RCF pursuant to Socket Internet's pending orders.

WHEREFORE, Socket Telecom and Socket Internet urge the Commission to resolve these issues in their favor after the hearings in this proceeding.

Respectfully submitted,

/s/ Carl J. Lumley

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Certificate of Service

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 13th day of August, 2007, by email and/or by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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