

December 6, 2006

Socket Telecom, LLC
R. Matthew Kohly
1005 Cherry Street, Suite 104
Columbia, MO 65201

Subject: Spectra Communications Group, LLC

Dear Mr. Kohly:

As per request in your letter of December 4, 2006, Spectra Communications Group, LLC ("Spectra") provides this brief summary of its position with regard to the dispute you describe in your letter. Spectra does not object to indirect connection *per se*. However, Spectra does object to the proposed use of indirect interconnection in a manner designed to evade the requirements established by the Commission in Section 4 of Article V. of the Interconnection Agreement, and/or that is otherwise inconsistent with requirements under the Federal Telecommunications Act.

Socket is proposing to remove all existing direct connections with Spectra and replace them with indirect connections regardless of the volume of traffic between Socket and Spectra end offices. This is a violation of both the wording and intent of Article V of the Interconnection Agreement. Socket currently has direct connections and Points of Interconnection (POIs) with Spectra. Article V., Section 4 specifically governs how and when additional POIs are to be added or existing POIs decommissioned. Socket cannot circumvent those requirements by removing POIs and replacing them with indirect connections regardless of the traffic levels.

The Commission created traffic thresholds in Article V., Section 4 as a method of equitably allocating the costs of interconnection between the parties. Socket cannot be allowed to circumvent that intention by asserting a right to indirectly interconnect even when traffic volumes are high and, even where a direct interconnection and local POI already exists.

Spectra also asserts that Socket's proposal to establish indirect interconnection for high volume routes is inconsistent with Article V., Section 11.1.4 which addresses high volume trunk groups.

Spectra is also concerned that Socket's indirect interconnection proposal would result in a violation of a fundamental requirement of the Federal Telecommunications Act. Section 47 U.S.C. 251 (c) (2) (B) provides that Socket's interconnection with Spectra must be at a technically feasible point within Spectra's network. If Socket were allowed to remove all existing direct connections to Spectra and rely entirely upon indirect connects there would be no connection within Spectra's network.

Spectra is willing to consider indirect connections where traffic on the routes is below the thresholds the Commission established in Article V., Section 4 and where the connection would otherwise be consistent with the Federal Telecommunications Act and the Interconnection Agreement. Indirect interconnection as currently proposed by Socket does not meet these requirements.

Your letter suggests that Article III, 18.4, Expedited Resolution Procedures would apply. As you stated, however, this section would only apply if the dispute materially affects or threaten to materially affect service to either Party's end-user customers or the ability of one Party to provide service to an end-user customer. Because there are already direct connections in place and the parties are currently exchanging traffic, such conditions do not exist and, thus, the expedited resolution procedures do not apply. As referenced above, the appropriate process for decommissioning a POI is set forth in Article V, Section 4.3.5.

Mr. Cal Simshaw will be Spectra's representative during the negotiations to attempt to resolve this dispute pursuant to Article III, Section 18.2. He may be contacted at the following address and phone number.

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Sincerely,

Susan W. Smith
Director – External Affairs