

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

Petition by KMC Telecom V, Inc., )  
KMC Telecom III LLC and KMC Data, )  
L.L.C., for Arbitration of an Interconnection ) Case No. \_\_\_\_\_  
Agreement with CenturyTel, Inc., CenturyTel of )  
Missouri, LLC, and Spectra Communications, )  
LLC, Pursuant to Section 252(b) of the )  
Communications Act of 1934, as Amended, and )  
Missouri Law )

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**TABLE OF AUTHORITIES <sup>1</sup>**

*Developing a Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *See also* “FCC Moves to Replace Outmoded Rules Governing Intercarrier Compensation,” FCC 05-33, FCC Press Release dated February 10, 2005.

*Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers, Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability*, WC Docket No. 04-313, CC Docket No. 01-338, Order on Remand (Rel. Feb. 4, 2005).

*Vonage Holdings Corporation Petition for Declaratory Ruling Concerning Order of the Minnesota Public Utilities Commission*, WC Docket No 03-211, FCC 04-267, Memorandum Opinion and Order (rel. Nov. 12, 2004).

*Vonage Holding Corp. v. Minnesota Pub. Util. Comm’n*, 290 F. Supp 2d 993, 1002 (D. Minn. 2003), *appeal pending*, *Vonage Holdings Corp. v. Minnesota Pub. Util. Comm’n*, No. 04-1434 (8<sup>th</sup> Cir. 2004).

*Vonage Holdings Corp. v. Minnesota Pub. Util. Comm’n*, No. 04-1434 (8<sup>th</sup> Cir. 2004).

*Petition of Core Communication, Inc, for Forbearance Under 47 USC 160(c) from Application of the ISP Remand Order*, WC Docket 03-171 (rel. Oct. 18, 2004).

*Petition for Declaratory Ruling that AT&T’s Phone-to-Phone IP Telephony Services are Exempt from Access Charges*, Order, WC Docket No. 02-361, FCC 04-97 (rel Apr 21, 2004).

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<sup>1</sup> This table of authorities is not an exhaustive list and shall be supplemented as necessary as the arbitration progresses.

*In the Matter of IP-Enabled Services*, Notice of Proposed Rulemaking, WC Docket No. 04-36 (rel Mar 10, 2004).

*In the Matter of Petition for Declaratory Ruling that pulver.com's Free World Dialup is Neither Telecommunications Nor a Telecommunications Service*, WC Docket No. 03-45, Memorandum Opinion and Order, FCC 04-27 (rel Feb 19, 2004).

*Level 3 Communications, LLC Petition for Forbearance Under 47 USC § 160(c) and Section 1.53 of the Commission's Rules from Enforcement of 47 USC § 251(g), Rule 51.701(b)(1), and Rule 69.5(b)*, WC Docket No 03-266 (filed Dec 23 2003).

*Investigation into the Use of Virtual NPA/NXX Calling Patterns*, UM 1058, Order (Ore. PUC May 27, 2003), rehearing denied, Order (Ore. PUC Sept 16, 2003).

*Petition for Arbitration of an Interconnection Agreement Between Level 3 Communications, LLC and CenturyTel of Washington, Inc*, Docket No. UT-023043, Seventh Supplemental Order: Affirming Arbitrator's Report and Decision (Wash. UTC Feb 27, 2003).

*Level 3 Communications, LLC Petition for Arbitration Pursuant to 47 USC Section 252 of Interconnection Rates, Terms, and Conditions*, Docket No. 05-MA-130, Order Approving an Interconnection Agreement, (Wisc. P.S.C. Feb 13, 2003).

*Southwestern Bell Tel. Co. v. Publ. Utils. Comm'n of Tex.*, 348 F.3d 482 (5th Cir.2003).

*Vonage Holding Corp. v. Minnesota Pub. Util. Comm'n*, 290 F. Supp 2d 993, 1002 (D. Minn. 2003).

*MCImetro Access Transmission Services v. Bellsouth Telecommunications and North Carolina PUC*, 352 F.3d 872 (2003).

*Investigation as to Whether Certain Calls are Local*, DT 00-223, *Independent Telephone Companies and Competitive Local Exchange Carriers – Local Calling Areas*, DT 00-054, Final Order, Order No. 24,080 (NH PUC Oct 28, 2002).

*Consolidated Complaints and Requests for Post-Interconnection Dispute Resolution Regarding Intercarrier Compensation for "FX-Type" Traffic Against Southwestern Bell Telephone Company*, TX PUC Docket No. 241015, Revised Arbitration Award, 31, Aug 28, 2002.

*Essex Telecom, Inc v Gallatin River Comm, L.L.C.*, Docket No. 01-0427, Order (Ill. C.C. July 24, 2002).

*Petitions of WorldCom, Inc., Cox Virginia Telecom, Inc., and AT&T Communications of Virginia, Inc., Pursuant to Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia Corporation Commission Regarding Interconnection Disputes with*

*Verizon Virginia, Inc., and for Arbitration, Memorandum Opinion and Order, CC Docket Nos. 00-218, 00-249 and 00-251, July 17, 2002.*

*Global NAPs, Inc. (U-6449-C) Petition for Arbitration of an Interconnection Agreement with Pacific Bell Telephone Company Pursuant to Section 252(b) of the Telecommunications Act of 1996, A.01-11-045, A.01-12-026, Opinion Adopting Final Arbitrator's Report With Modification (Cal. PUC July 5, 2002).*

*In the Matter of Joint Application of GTE Midwest Incorporated, d/b/a Verizon Midwest, and CenturyTel of Missouri, LLC, for (1) Authority to Transfer and Acquire Part of Verizon Midwest's Franchise, Facilities or System Located in the State of Missouri; (2) for Issuance of Certificate of Service Authority to CenturyTel of Missouri, LLC; (3) to Designate CenturyTel of Missouri, LLC, as Subject to Regulation as a Price Cap Company; and (4) to Designate CenturyTel of Missouri, LLC as a Telecommunications Carrier Eligible to Receive Federal Universal Support, Case No. TM-2002-232, Report and Order (effective May 31, 2002).*

*Petition of Global NAPs, Inc. for Arbitration of Interconnection Rates, Terms, and Conditions and Related Arrangements with United Telephone Company of Ohio dba Sprint, Case Nos. 01-2811-TP-ARB, 01-3096-TP-ARB (PUC Ohio May 9, 2002).*

*Investigation into appropriate methods to compensate carriers for exchange of traffic subject to Section 251 of the Telecommunication's Act of 1996, Docket No. 000075-TP, Order Approving Stipulation, Phase I, Order No. PSC-02-0634-AS-TP (Florida PSC May 7, 2002).*

*Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, CC Docket 96-98, and Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68, Order on Remand and Report and Order, 15 FCC Rcd 3953 (rel. April 27, 2001) (Intercarrier Compensation Remand Order), remanded WorldCom, Inc. v. FCC, No. 01-1218 (D.C. Cir. May 3, 2002).*

*DPUC Investigation of the Payment of Mutual Compensation for Local Calls Carried Over Foreign Exchange Service Facilities, Dkt. No. 01-01-29 (Conn. DPUC Jan 30, 2002).*

*Allegiance Telecom of Ohio, Inc.'s Petition for Arbitration of Interconnection Rates, Terms, and Conditions, and Related Arrangements with Ameritech Ohio, Case No. 01-724-TP-ARB, Arbitration Award (PUC Ohio Oct 4, 2001).*

*In the Matter of the Petition for Arbitration to Establish an Interconnection Agreement Between TDS Metrocom, Inc and Ameritech Michigan, MPSC Case No. U-12952, Opinion and Order, Sept 7, 2001.*

*In the Matter of the Application of AT&T Communications of the Southwest, Inc., TCG St. Louis and TCG Kansas City, Inc., for Compulsory Arbitration of Unresolved Issues with Southwestern Bell Telephone Company Pursuant to Section 252 (b) of the Telecommunications Act of 1996,*

Case No. TO-2001-455, Order Setting Prehearing, Conference and Directing Filing (effective April 16, 2001).

Letter dated March 28, 2001 from Gary L. Phillips, SBC Telecommunications, Inc., to Dorothy Attwood, Chief, Common Carrier Bureau, Federal Communications Commission, *See ex parte* filings in FCC CC Docket No. 99-68.

Letter dated March 28, 2001 from Gary L. Phillips, SBC Telecommunications, Inc., to Dorothy Attwood, Chief, Common Carrier Bureau, Federal Communications Commission.

Letter dated March 7, 2001 from Susanne Guyer, Verizon, to Dorothy Attwood, Chief, Common Carrier Bureau, Federal Communications Commission.

*In re Developing a Unified Inter-carrier Compensation Regime*, 16 FCC Rcd. 9610 (2001).

Letter dated December 13, 2000 from John T. Nakahata, Counsel to Level 3 Communications, to Magalie Roman Salas, Secretary, Federal Communications Commission.

*In the Matter of the Petition of Sprint Communications Company, L.P., for Arbitration of Unresolved Interconnection Issues regarding xDSL with Southwestern Bell Telephone Company*, Case No. TO-99-461, Notice of Petition for Arbitration (effective April 27, 1999).

*Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order (rel. Aug. 8, 1996).

*Access Charge Reform, First Report and Order*, 12 FCC Rcd. 15982 (1997), *aff'd*, *Southwestern Bell Tel Co v FCC*, 153 F.3d 523 (8th Cir 1998).

*WATS Related and Other Amendments of Part 69 of the Commission's Rules*, 64 RR 2d 503, 3 FCC Rcd 496 (1988).

*MTS and WATS Market Structure*, 97 FCC 2d 682, (1983), *aff'd in principal part and remanded in part*, *National Ass'n of Regulatory Util Comm'rs v FCC*, 737 F.2d 1095 (DC Cir. 1984).

47 U.S.C. §§ 251 (a)-(c)  
47 U.S.C. § 251(b)  
47 U.S.C. § 251(c)  
47 U.S.C. § 251(c)(2)  
47 U.S.C. § 251(h)

47 U.S.C. § 252(b)  
47 U.S.C. § 252(b)(4)(C)  
47 U.S.C. § 252(c)(2)  
47 U.S.C. § 252(d)  
47 U.S.C. § 252(d)(1)

47 U.S.C. § 252(d)(2)

47 C.F.R. § 51

47 C.F.R. § 51.305

47 C.F.R. § 51.701

47 C.F.R. § 51.703(b)

47 C.F.R. § 69.5(b)

4 CSR 240-2

4 CSR 240-36

4 CSR 240-36.040