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

| In the Matter of CenturyTel of Missouri,                         |                          |
|--|--------------------------|
| LLC d/b/a CenturyTel and Spectra Communications Group, LLC d/b/a | Case No. 11-2006-0113    |
| CenturyTel Tariff Filings to Impose Retail                       | 1 ariii No. J1-2006-0152 |
| Emergency Telephone Service 911 Tariff                           | Tariff No. JI-2006-0153  |
| Provisions upon CLEC Competitors                                 | )                        |

## STAFF'S RESPONSE TO SOCKET TELECOM, LLC'S MOTION TO SUSPEND OR REJECT PROPOSED TARIFF SHEETS

COMES NOW the Staff of the Missouri Public Service Commission and for its response states:

- 1. On August 31, 2005, CenturyTel of Missouri, LLC, and Spectra Communications Group, LLC d/b/a CenturyTel filed proposed tariff revisions, Tariff File Nos. JI-2006-0152 and JI-2006-0153, respectively, "to modify the Definition of Terms for Private Switch Service(s) to include any third party, including public switch providers, utilizing the service."
- 2. On September 13, 2005, Socket Telecom, LLC filed a motion asking the Commission to suspend or reject tariffs. Socket Telecom's motion states that "[t]he proposed tariff sheets seek to extend the application of [CenturyTel of Missouri's and Spectra's] retail Private Switch 911 Service to CLECs that are its competitors and wholesale customers by adding a single footnote . . ."
- 3. On September 15, 2005, the Commission issued an order directing that any party wishing to respond to Socket Telecom's motion shall do so on or before September 21, 2005.

4. In the attached Memorandum, which is labeled Appendix A, the Staff recommends that the proposed tariff revisions be suspended pending review.

5. The Staff requests the scheduling of a prehearing conference to bring the companies together to discuss the intent and impact of these proposed tariff revisions.

6. Pursuant to Section 392.230.2 RSMo 2000, the Commission may suspend the operation of a tariff filing and enter upon a hearing concerning the projects of the tariff filing.

WHEREFORE, the Staff recommends that the Commission suspend these tariff filings and schedule a prehearing conference.

Respectfully submitted,

DANA K. JOYCE General Counsel

## /s/ William K. Haas

William K. Haas Deputy General Counsel Missouri Bar No. 28701

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
williamhaas@psc.state.mo.us

## **Certificate of Service**

| I hereby  | certify t | hat copies | of the   | foregoing  | have     | been  | mailed,               | hand-delivered,  | transmitted 1 | by |
|-----------|-----------|------------|----------|------------|----------|-------|-----------------------|------------------|---------------|----|
| facsimile | or electr | onically m | ailed to | all counse | el of re | ecord | this 20 <sup>th</sup> | day of September | er 2005.      |    |

/s/ William K. Haas