

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

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

RESPONSE TO ORDER DIRECTING FILING

COME NOW CenturyTel of Missouri, LLC and Spectra Communications Group, LLC d/b/a CenturyTel (collectively “Respondents”), and for their *Response to Order Directing Filing* issued on September 11, 2007, respectfully state as follows:

Response to STCG’s Petition For Leave to File Amicus Brief

1. Respondents support STCG’s Petition due to the unique issues interjected by Socket in this particular proceeding, as discussed below.
2. One of Socket’s purported legal bases for its requested relief is that it is an “industry agreed-upon practice” for incumbent local exchange carriers to provide “location portability”. Not only the simple fact that the STCG felt compelled to file its Petition, but also the contents of the STCG’s amicus brief itself, directly contradict Socket’s allegation with respect to the STCG’s several member incumbent carriers. The Commission necessarily must consider this relevant information in light of the evidentiary record now before it.
3. The STCG’s amicus brief provides additional support from an *independent group of Missouri incumbent carriers* that Respondents’ evidence and arguments are in

fact correct with respect to how Socket's proposed scheme, if approved, would allow Socket to improperly shift interexchange network costs caused by Socket's ISP and other traffic onto other carriers. The Commission should have the opportunity to consider STCG's arguments in light of Socket's allegation that its scheme would not negatively impact Respondents, Respondents' customers, and other third party carriers.

4. Neither the FCC nor any other state commission has yet to mandate "location portability". In fact, as noted in Respondents' brief the FCC has repeatedly considered but has thus far declined to impose a "location portability" obligation. Even any initial movement *toward* a new federal policy recommendation by the LNPA-WG respecting "location portability" is in its extremely early stages. Likewise, if the Commission grants Socket's requested relief it will have a direct statewide impact on other Missouri carriers, as evidenced by the STCG's amicus brief. Given Socket's attempted and aggressive use of "industry agreed-upon practices" (with the Staff's concurrence), and its federal law arguments and actions with respect to PIM 60 on the national level, there seems little doubt that should Socket prevail in this case it will attempt to use the Commission's order against other incumbent carriers.

Continuing Settlement Negotiations

5. Respondents verify that the parties are at this time continuing settlement discussions with Socket and the Staff in this case and in the Remote Call Forwarding case.

WHEREFORE, Respondents urge the Commission to grant the STCG's Petition and consider the information contained in the STCG's amicus brief should the parties be unsuccessful in ultimately reaching a settlement.

Respectfully submitted,

/s/ Charles Brent Stewart

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by electronic mail or mailed, First Class postage prepaid, to the attorneys of all parties of record in Case No. TC-2007-0341 on the 20th day of September, 2007.

/s/ Charles Brent Stewart
