

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

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| In the Matter of CenturyTel of Missouri, LLC and) | |
| Spectra Communications Group, LLC d/b/a) | Case No. TT-2006-0113 |
| CenturyTel Tariff Filings Relating to 911 Private) | Tariff No. JI-2006-0152 |
| Switch Clarification) | Tariff No. JI-2006-0153 |

**CENTURYTEL OF MISSOURI, LLC AND SPECTRA COMMUNICATIONS
GROUP, LLC D/B/A CENTURYTEL’S RESPONSE IN OPPOSITION
TO SOCKET TELECOM, LLC’S MOTION TO SUSPEND OR
REJECT PROPOSED TARIFF SHEETS**

COME NOW CenturyTel of Missouri, LLC (“CenturyTel”) and Spectra Communications Group, LLC d/b/a CenturyTel (“Spectra”) (collectively referred to herein as “Respondents”), pursuant to the Commission’s *Order Shortening Time In Which To Respond* issued in this matter on September 15, 2005, and for their Response in Opposition to Socket Telecom, LLC’s (“Socket”) Motion to Suspend or Reject Proposed Tariff Sheets¹ respectfully state as follows:

1. On August 31, 2005, CenturyTel and Spectra filed proposed tariff revisions, Tariff File Nos. JI-2006-0152 and JI-2006-0153, respectively, regarding “911 Private Switch Clarification.”² Respondents requested effective dates of September 30, 2005, for the respective revised tariff sheets, in accordance with 4 CSR 240-3.545.

2. On September 13, 2005, Socket filed a motion requesting the Commission to suspend or reject the tariffs, alleging that Respondents “filed proposed tariff sheets to

¹ Respondents are in receipt of Staff’s Response to Socket Telecom, LLC’s Motion to Suspend or Reject Proposed Tariff Sheets, filed on September 20, 2005, wherein the Staff recommends that the proposed tariff revisions be suspended pending review and that the Commission schedule a prehearing conference in this matter. Respondents oppose Staff’s recommendation to suspend these tariff filings for the reasons stated herein.

² The August 31, 2005 cover letters for both filings reflect “RE: 911 Private Switch Clarification” and Respondents submit that the caption for this matter should be amended accordingly, as set forth above.

add language to the Emergency Telephone Service 911 section of its retail PSC Mo. Tariff No. 1 General and Local Exchange Tariff in an unlawful and unreasonable attempt to impose the provisions thereof upon CLEC competitors that are its wholesale customers under interconnection agreements.” Respondents deny the allegations contained in Socket’s Motion.

3. At the outset, Socket is well aware that it has no interconnection agreement with Spectra, as this Commission so determined in Case No. CO-2005-0066.

4. As stated in the cover letters for the subject tariff filings, the purpose of the tariff “is to modify the Definition of Terms for Private Switch Service(s) to include any third party, including public switch providers, utilizing the service.” Respondents filed the revised tariff sheets to clarify the applicability of those specific provisions.

5. CenturyTel and Spectra have no intentions of unilaterally imposing this service on any telecommunications carrier. It is any telecommunications carrier’s right to request that services relating to 911 be included in their contractual arrangement between our companies. However, there have been numerous companies who have chosen to order required 911 services from the existing tariffs, or who have agreed to terms in their interconnection agreement that references the tariff. There are presently fourteen carriers in Missouri to whom this exact situation applies. Based on this, it is CenturyTel and Spectra’s intention to merely revise the tariff to acknowledge and clarify the provision of this service to telecommunication carriers.

6. Socket states that federal law “requires” that 911 arrangements between ILECs and telecommunication carriers must be covered by interconnection agreements. As stated above, we do not disagree that any telecommunication carrier has the right to

include these services in their contractual arrangement; however, this statement is inconsistent with approved 911 tariffs in this state and others. Please note, Southwestern Bell Telephone Company's, General Exchange Tariff, Section 31, Wireless 911 Service which applies to CMRS providers. The same LEC interconnection obligations apply to all telecommunication carriers, including CMRS. BellSouth Telecommunications, Inc. has 911 services tariffed in all their states as well.

7. Socket correctly states that CenturyTel's and Spectra's proposed tariff changes would not apply to them. The proposed change would only apply to those telecommunication carriers who choose to directly order the service from the tariff or whose contract references the application of such services. Socket's allegation that "CenturyTel intends to try to impose its tariff upon Socket" is incorrect. Socket further stated that CenturyTel improperly attempted to bill Socket out of its tariff even before filing the proposed changes. Again, this is incorrect. As noted by Socket, Appendix 7 of Attachment 14 of the AT&T Communications of the Southwest, Inc. and GTE Midwest, Inc. Interconnection Agreement, adopted by Socket on July 7, 2002, indicates that prices for E911/911 are "TBD". This is not the case for 911 interconnection services. The Agreement in 37.10.2 specifically addresses rates for interconnection services. These services are being billed pursuant to the Agreement. In June, Socket requested the ability to create ALI records in their computer data-base and upload the records to CenturyTel. Because there are no rates in the Agreement for this service, Socket was given the reference to the tariff for applicable rates. The requested service was subsequently implemented. After implementation of the service Socket refused to pay what we had understood would be the applicable quoted TBD rates.

WHEREFORE, Respondents respectfully submit their response in opposition to the Motion to Suspend or Reject Proposed Tariff Sheets, and request that the subject tariffs be allowed to go into effect by operation of law.

Respectfully submitted,

/s/ Larry W. Dority

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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 e-mail or mailed, First Class, postage prepaid, this 21st day of September, 2005, to:

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