

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

MCImetro Access Transmission Services, LLC,)
Brooks Fiber Communications of Missouri, Inc.,)
and Intermedia Communications, Inc.,) Case No. LC -2005-0080
)
Complainants,)
)
vs.)
)
CenturyTel of Missouri, LLC,)
)
Respondent.)

**MOTION FOR LEAVE TO
FILE AMENDED COMPLAINT TO
ENFORCE INTERCONNECTION AGREEMENTS**

COME NOW MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of Missouri, Inc. and Intermedia Communications, Inc. (collectively hereinafter referred to as "MCI"), and pursuant to 4 CSR 2.080(20) for their Motion for Leave to File their Amended Complaint to Enforce Interconnection Agreements state:

On September 20, 2004, MCI filed its Complaint to Enforce Interconnection Agreements. Since then, MCImetro has become the successor-in-interest to Intermedia Communications, Inc., through a Commission - issued Order in Case No. TM-2005-0129, granting merger and canceling certificate and tariff. MCI proposes to amend the Complaint to address this subsequent development.

Further, in its Amended Complaint, MCI corrects some minor typographical errors and makes adjustments to reflect the pleading is an amended complaint rather than the original filing.

The proposed Amended Complaint is attached hereto.

WHEREFORE, MCI requests the Commission to issue an order granting MCI leave to file its Amended Complaint to Enforce Interconnection Agreements.

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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of Missouri, Inc. and Intermedia Communications, Inc.

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing was served upon the parties identified on the attached service list on this 12th day of January, 2005, by placing same in the U.S. Mail, postage paid.

/s/ Carl J. Lumley

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