

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

Southwestern Bell Telephone, L. P., d/b/a SBC Missouri's)
Petition for Compulsory Arbitration of Unresolved Issues)
For a Successor Interconnection Agreement to the) Case No. TO-2005-0336
Missouri 271 Agreement ("M2A"))

**RESPONSE OF NAVIGATOR TELECOMMUNICATIONS, LLC.
TO SBC'S PETITION FOR ARBITRATION**

Comes now Navigator Telecommunications, LLC. ("Navigator"), by its undersigned counsel, and pursuant to 47 U.S.C. § 252(b)(3) and 4 C.S.R. 240-36.040(7), submits this response to the Petition for Arbitration filed by Southwestern Bell Telephone, L. P., d/b/a SBC Missouri ("SBC").

1. Navigator admits the allegations in paragraph 1 of the Petition, with the exception of the allegation that "most" CLECs in Missouri have entered into the M2A with SBC.
2. Navigator admits the allegations in paragraph 2, although the Commission has the power to extend the effectiveness of the M2A.
3. Navigator admits the allegations in paragraph 3.
4. Navigator does not have sufficient information to admit or deny the allegations in paragraphs 3 through 6 of the Petition.
5. Navigator admits the allegations in paragraph 7.
6. Navigator does not have sufficient information to admit or deny the allegations in paragraphs 8 through 9 of the Petition.
7. Navigator admits the allegations in paragraphs 10 through 15 of the Petition.
8. Navigator does not have sufficient information to admit or deny the allegations in paragraphs 16 through 19 of the Petition, with the exception of the allegation in paragraph 19 relating to the DPLs for Navigator attached to the Petition as Exhibit 17. Attached hereto as

Exhibit 1 are Navigator's DPLs, setting forth Navigator's position concerning the issues which are still in dispute between Navigator and SBC.

9. Navigator admits the allegations in paragraphs 20 and 21, as they relate to the proposed Interconnection Agreement with Navigator.

10. No response to paragraph 22 of the Petition is required.

11. Navigator is an Arkansas limited liability company operating as a Competitive Local Exchange Carrier and long-distance reseller in Missouri pursuant to certifications granted by this Commission in Case No. TA-98-383, as amended in Case No. TA-200-243 and Case No. TA-2000-232. Navigator's principal place of business is located at 8525 Riverwood Park Drive, P.O. Box 13860, North Little Rock, AR 72113, telephone (501) 954-4000. Please direct all correspondence, pleadings, orders, and testimony in this proceeding to:

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was served electronically and mailed, postage prepaid, this 25th day of April, 2005, to:

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