

Mark P. Johnson
816.460.2424
mjohnson@sonnenschein.com

4520 Main Street
Suite 1100
Kansas City, MO 64111
816.460.2400
816.531.7545 fax
www.sonnenschein.com
*Chicago
Kansas City
Los Angeles
New York
San Francisco
Short Hills, N.J.
St. Louis
Washington, D.C.
West Palm Beach*

July 22, 2005

Via Federal Express

Ms. Colleen Dale, Secretary
MISSOURI PUBLIC SERVICE COMMISSION
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

RE: Case No. TO-2005-0336

FILED⁴

JUL 25 2005

**Missouri Public
Service Commission**

Dear Ms. Dale:

Enclosed for filing with the Commission please find the original and eight copies of the Motion for Reconsideration or, in the Alternative, Motion for Order Nunc Pro Tunc in the above-referenced case. Please return a filed-stamped copy of the motion to me in the enclosed return envelope.

Should you or your Staff have any questions concerning this matter, please do not hesitate to call me.

Very truly yours,

/s/ Mark P. Johnson

Mark P. Johnson

MPJ/rgr
Enclosures

FILED⁴

JUL 25 2005

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Missouri Public
Service Commission

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)
Missouri 271 Agreement ("M2A"))

Case No. TO-2005-0336

**MOTION FOR RECONSIDERATION OR, IN THE ALTERNATIVE, MOTION FOR
ORDER NUNC PRO TUNC**

Comes now CenturyTel Fiber Company II LLC ("CenturyTel Fiber"), by its undersigned attorneys, and pursuant to 4 CSR 240-2.160, moves for reconsideration of the Commission's Order of July 14, 2005, or, in the alternative, for an Order Nunc Pro Tunc, adding CenturyTel Fiber to the list of telecommunications carriers whose interconnection agreements with SBC are amended to extend their expiration date to August 10, 2005. In support of this Motion, CenturyTel Fiber states the following:

1. CenturyTel Fiber is the successor to Digital Teleport, Inc. ("DTI") in an M2A interconnection agreement with SBC. As part of the DTI bankruptcy, and CenturyTel Fiber's acquisition of DTI's assets in bankruptcy, the M2A interconnection agreement then in place between DTI and SBC was assigned to CenturyTel Fiber. SBC has honored that assignment, and has in all respects dealt with CenturyTel Fiber as the legitimate successor to DTI in the interconnection agreement.

2. On July 13, 2005, CenturyTel Fiber's Senior Vice President and General Counsel received from SBC a notice concerning the selection of a successor to the M2A. A copy of that notice is attached hereto as **Exhibit A**. As the notice indicates, CenturyTel Fiber is to make a selection of the M2A agreement it wishes to adopt to succeed the existing DTI-SBC agreement.

3. On July 14, one day later, the Commission issued its Order, extending the procedural schedule for filing conforming agreements in this proceeding. The Commission also

amended by interlineation the existing M2A agreements of many carriers, extending the expiration date of those agreements to and including August 10, 2005. Although a CenturyTel Fiber affiliate, CenturyTel Solutions LLC, has its own M2A interconnection agreement with SBC, and is listed among the carriers subject to this amendment by interlineation, CenturyTel Fiber is not so listed in the Commission's July 14, 2005 Order in this docket even though it is the successor-in-interest to DTI's M2A agreement with SBC.

4. By this Application, CenturyTel Fiber requests that the Commission reconsider its July 14 Order and include CenturyTel Fiber among the companies listed in paragraph 2 of the Ordered Section, or, in the alternative, CenturyTel Fiber requests that the Commission issue an Order Nunc Pro Tunc, finding that CenturyTel Fiber should be included among the listed companies. The Commission's preferred procedural mechanism is of no consequence to CenturyTel Fiber (hence this Application is stated in the alternative). CenturyTel Fiber simply wishes to protect itself and its customers, so it can continue to provide reliable service while it is considering its options as to the adoption of a successor M2A agreement.

Wherefore, CenturyTel Fiber requests that the Commission reconsider paragraph 2 of the Ordered Section of its July 14 Order, or, in the alternative, issue an Order Nunc Pro Tunc providing that (1) CenturyTel Fiber is included among the list of carriers whose M2A interconnection agreements with SBC are extended to and including August 10, 2005, and (2) that CenturyTel Fiber shall be included among those interested carriers with M2A interconnection agreements in any future Commission Orders or Notices.

Respectfully submitted,

/s/ Mark P. Johnson

Mark P. Johnson Mo. Bar #30740

SONNENSCHN NATH & ROSENTHAL LLP

4520 Main Street, Suite 1100

Kansas City, MO 64111

Tel: 816/460-2400

Fax: 816/531-7545

mjohnson@sonnenschein.com

ATTORNEYS FOR CENTURYTEL FIBER
COMPANY II LLC

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 22nd day of July, 2005, to:

Dana K. Joyce
General Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
d.joyce@psc.mo.gov
gencounsel@psc.mo.gov

Lewis Mills
Office of the Public Counsel
P. O. Box 2200
Jefferson City, MO 65102-2200
opcservice@ded.mo.gov

Paul G. Lane/Leo J. Bub
Robert J. Gryzmala/Mimi B. MacDonald
Southwestern Bell Telephone, L.P.
One SBC Center, Room 3518
St. Louis, MO 63101
paul.lane@sbc.com
lb7809@momaol.sbc.com

Mark Comley
601 Monroe Street, Suite 301
P. O. Box 537
Jefferson City, MO 65102-0537
comleym@ncrpc.com

Kenneth A. Schiffman/Mark A. Grover
Sprint
6450 Sprint Parkway, Bldg. 14
Mail Stop KSOPHN0212-2A303
Overland Park, KS 66251
kenneth.schiffman@mail.sprint.com
mark.a.grover@mail.sprint.com

Stephen F. Morris/Kathy Jespersen
Spy Sinantha
MCI WorldCom Communications, Inc.
MCImetro Access Transmission Services, LLC
701 Brazos, Suite 600
Austin, TX 78701
stephen.morris@mci.com
kathy.jespersen@mci.com
spy.sinantha@mci.com

William Steinmeier
Mary Ann (Garr) Young
William D. Steinmeier, P.C.
P. O. Box 104595
Jefferson City, MO 65110
myoung0654@aol.com
wds@wdspc.com

Kevin K. Zarling/Mary Anne Allen
L. Fredrick Cederqvist/Jerry Hicks
Sheila Paananen
AT&T Communications of the Southwest, Inc.
TCG Kansas City/TCG St. Louis
919 Congress, Suite 900
Austin, TX 78701
kzarling@att.com
masa@att.com
fcederqvist@att.com
jghicks@att.com
sheilapaananen@att.com

Bill Magness
Casey & Gentz, LLP
98 San Jacinto Blvd., Suite 1400
Austin, TX 78701
bmagness@phonelaw.com

James M. Fischer
Larry W. Dority
Fischer & Dority, P.C.
101 Madison, Suite 400
Jefferson City, MO 65101
lwdority@sprintmail.com

Carl J. Lumley
Leland B. Curtis
Curtis, Heinz, Garrett & O'Keefe, P.C.
130 S. Bemiston, Suite 200
Clayton, MO 63105
clumley@lawfirmemail.com
lcurtis@lawfirmemail.com

Kathy L. Hough
WilTel Local Network, LLC
One Technology Center TC-15L
Tulsa, OK 74103
kathy.hough@wiltel.com

/s/ Mark P. Johnson

Rec'd 7/13/05

SBC Operations, Inc.
Four SBC Plaza, 9th Floor
311 S. Akard
Dallas, TX 75202



Daniel A. Davis
Senior Vice President & General Counsel
CenturyTel Fiber Company II, LLC
14567 N. Outer Forty Road
Suite 500
Chesterfield, MO 63017

Re: Selection of Successor M2A

This letter is to advise that you will soon need to make a selection of the M2A successor agreement under which you intend to operate beginning July 19, 2005.

As you are aware, the procedural schedule in the M2A successor arbitration (Case No. TO-2005-0336) called for the Missouri Public Service Commission ("MO PSC") to issue its award on July 6, 2005. Conforming agreements were then to be filed by the parties on July 13, 2005 and approved by the Commission on July 19, 2005.

Per the terms of our Memorandum of Understanding ("MOU"), CenturyTel Fiber Company II, LLC has 10 days from the date that the first M2A successor agreement is approved to choose which successor M2A agreement it intends to operate under on and after July 19, 2005 (termination date of the M2A). On the date that we file the conformed agreement with the Commission, SBC will post the filed agreements on CLEC Online to assist you in making a selection.

While it is possible that these procedural dates may be extended slightly, it is very important to adhere as close as possible to the schedule set by the MO PSC in the procedural order to ensure that the replacement agreements are put in place in a timely and orderly fashion.

For all CLECs with a current M2A agreement and that are not a party to the Arbitration, we will therefore need you to make your M2A successor agreement selection by printing your specific short form located on CLEC Online (detailed instructions will be provided online), make your Agreement Case No. and Inter-carrier Compensation selections, sign and fax to SBC (fax no. 1-800-404-4548) no later than ten days after the Commission approves the M2A successor agreements. (It is our understanding that the Commission intends to assign a specific case number to each arbitrated agreement and approve them all at one time.) If your signed selection is not received by SBC within that ten day period, then per the terms of the MOU, you will be deemed to have chosen the first successor M2A approved by the Missouri Commission.

SBC will return a copy of the executed signature page to you for your records. SBC will file the short form of the parties under the terms of 4 CSR 240-3.513. Where no signature page has been received, SBC will file under subpart (b) of that same rule.

Please contact your Account Manager with any questions.

Sincerely,

Notices Manager

EXHIBIT A