

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

In the Matter of the Modifications of	)	
The Federal Communications Commission	)	
Requirement to Implement Intermodal	)	Case No. IO-2008-0187
Local Number Portability for Small Rural	)	
Local Exchange Carriers in Missouri	)	

Request for Clarification or Modification

Come now the Missouri Small Telephone Group (“STCG” or “Companies”) and for its request for clarification or modification states to the Missouri Public Service Commission (Commission or PSC) as follows:

1. Ordered paragraph 2 of the PSC’s January 25, 2008 *Order Acknowledging Status Report* directs the STCG to notify the Commission when the U.S. Court of Appeals for the D.C. Circuit’s stay of the FCC’s intermodal local number portability (LNP) rules is lifted.

2. The STCG is not a party to the D.C. Circuit proceedings related to the FCC’s intermodal LNP requirements, and the STCG receives no notice of activities in that case. Nevertheless, the STCG did a PACER search of the D.C. Circuit’s docket and could find no indication that the D.C. Circuit’s stay has been lifted at this time. (See Attachment.)

3. As a practical matter, any events related to intermodal LNP in Missouri are already covered by the existing and ongoing requirements for the STCG companies to notify the PSC under the following circumstances:

- a. Within thirty (30) days of receipt of a request for intermodal LNP; or
- b. Within thirty (30) of the FCC's promulgation of new rules
concerning intermodal LNP.

See Ordered ¶¶ 3 & 4 of the *Order Acknowledging Receipt of Status Report*.

4. Because the PSC will already receive notice under either of the circumstances detailed above, it is unnecessary to require the STCG to regularly monitor the docket and filings in a federal case to which the STCG is not a party.

5. The requirement to monitor the D.C. Circuit docket will impose costs of research time and money on the STCG.

6. Accordingly, the STCG respectfully requests that the PSC clarify or modify its January 25, 2008 order to eliminate the requirement for the STCG to monitor the D.C. Circuit's docket.

WHEREFORE, the STCG Companies respectfully request that the Commission grant this request for clarification or modification and issue such other relief as the Commission deems appropriate.

Respectfully submitted,

/s/ Brian T. McCartney

W.R. England, III Mo. Bar #23975
Brian T. McCartney Mo. Bar #47788
BRYDON, SWEARENGEN & ENGLAND P.C.
312 East Capitol Avenue
Jefferson City, Missouri 65102-0456
573/635-7166 (tel.)
573/634-7431 (fax)
trip@brydonlaw.com
bmccartney@brydonlaw.com

Attorneys for the STCG

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been sent by electronic mail this 7th day of February, 2008, to:

General Counsel
Office of the General Counsel
Missouri Public Service Commission
Governor's Office Building
200 Madison Street
P.O. Box 360
Jefferson City, Missouri 65102

Mike Dandino
Office of the Public Counsel
Governor's Office Building
200 Madison Street
P.O. Box 7800
Jefferson City, Missouri 65102

/s/ Brian T. McCartney

Brian T. McCartney