

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Access One, Inc.; ACN Communications)	
Services, Inc.; Ascendtel, LLC; AT&T)	
Communications of Illinois, Inc.;)	
Broadview Networks, Inc.; BullsEye Telecom,)	
Inc.; Cbeyond Communications, LLC; US)	
Xchange of Illinois, LLC, d/b/a Choice One)	
Communications; CIMCO Communications,)	
Inc.; CityNet Illinois, LLC; DSLnet)	
Communications, LLC; First Communications,)	
LLC; Forte Communications, Inc.;)	
Globalcom, Inc.; ICG Telecom Group, Inc.;)	Docket No. 05-0442
King City Telephone, LLC, d/b/a Southern)	
Illinois Communications; KMC Telecom V,)	
Inc.; Looking Glass Networks, Inc.;)	
McLeodUSA Telecommunications Services,)	
Inc.; Mpower Communications Corporation,)	
d/b/a Mpower Communications of Illinois;)	
Neutral Tandem-Illinois, LLC; New Edge)	
Network, Inc.; nii communications, Ltd.;)	
Novacon Holdings LLC; Nuvox)	
Communications of Illinois, Inc.; OnFiber)	
Carrier Services, Inc.; RCN Telecom Services of)	
Illinois, LLC; TCG Chicago; TCG Illinois; TDS)	
Metrocom, LLC; and Trinsic)	
Communications, Inc.)	
)	
Petition for Arbitration Pursuant to)	
Section 252(b) of the Telecommunications Act of)	
1996 with Illinois Bell Telephone Company d/b/a)	
SBC Illinois to Amend Existing Interconnection)	
Agreements to Incorporate The <i>Triennial Review</i>)	
<i>Order And the Triennial Review Remand Order</i>)	

**MOTION TO COMPEL COMPLIANCE WITH
COMMISSION ORDER OF NOVEMBER 3, 2005**

Illinois Bell Telephone Company (“AT&T Illinois”¹ or the “Company”), by its attorneys, hereby files this Motion to Compel Compliance with the Commission’s Order of November 3, 2005 (“Motion to Compel”) in order to assure that all parties to this proceeding are complying

¹ Effective January 1, 2006, Illinois Bell Telephone Company will identify itself in this proceeding as “AT&T Illinois” instead of “SBC Illinois.”

with the Commission's directive to sign and file a conforming TRO/TRRO Amendment by the required deadline. In support of this Motion, AT&T states as follows:

1. Docket 05-0442 is an arbitration proceeding begun by mutual agreement of AT&T Illinois and approximately 45 CLECs for the purpose of resolving contested issues concerning the implementation of the FCC's Triennial Review Order ("TRRO") and Triennial Review Remand Order ("TRRO"). AT&T Illinois and the CLECs were able to mutually agree upon most of the terms and conditions in a TRO/TRRO Amendment implementing these FCC Orders, but they were unable to resolve approximately 33 issues and, therefore, initiated this proceeding in order to obtain Commission resolution of those disputed items.

2. On November 3, 2005, the Commission entered an Arbitration Order in this proceeding resolving all of the 33 contested issues between the parties and ordering that each party file a completed TRO/TRRO Amendment for Commission approval pursuant to Subsection 252(e) of TA96 within 15 days of the date of the Order, or November 18, 2005. *Arbitration Order at 225.*

3. On November 3, 2005, AT&T filed an Agreed Motion to Extend Time for Filing Conforming Amendment, requesting on behalf of all parties that the Commission extend the deadline for filing a conformed TRO/TRRO Amendment to December 30, 2005. This Motion was granted by the Commission in an Order dated December 15, 2005.

4. On December 30, 2005, AT&T Illinois filed a "Report" in which it reported to the Commission that it had received a signed TRO/TRRO Amendment from all but eleven of the CLEC parties to this proceeding. AT&T Illinois further stated that it expected those eleven CLECs to return executed TRO/TRRO Amendments promptly, but if they did not do so by

January 9, 2006, it would file a Motion to Compel, or some other appropriate motion with the Commission to assure compliance with its Order.

5. As of January 9, 2006, nine of the eleven CLECs (listed below) have failed to execute and return to AT&T Illinois the executed TRO/TRRO Amendment. AT&T Illinois has been in contact with several of these CLECs and understands that they intend to sign and return the TRO/TRRO Amendment. AT&T Illinois will promptly advise the Commission if this happens.

6. The CLECs that have, to date, not signed the TRO/TRRO Amendment are as follows:

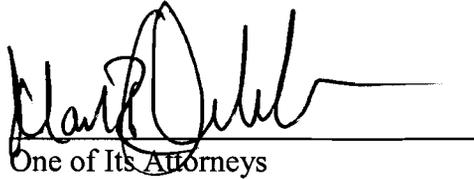
1. Bitwise Communications, Inc.
2. BullsEye Telecom, Inc.
3. Forte Communications, Inc.
4. King City Telephone, LLC
5. New Edge Network, Inc.
6. nii Communications, Ltd.
7. Novacon Holdings LLC
8. OnFiber Carrier Services, Inc.
9. Think 12 Corporation

7. AT&T Illinois provided each of these CLECs, in early December 2005, a package which contains the negotiated/conformed TRO/TRRO Amendment, together with a Joint Petition for approval of the amendment to be filed with the Commission. These CLECs have had ample opportunity to review, execute and return the documents to AT&T Illinois for filing.

WHEREFORE, for all of the reasons set forth above, AT&T Illinois requests an order from the Commission compelling each of the above-named CLECs to comply with the Commission's Order and to execute the TRO/TRRO Amendment so that it may be filed with the Commission for approval. In addition, AT&T Illinois requests that the Commission award to AT&T Illinois its costs and attorneys fees incurred in connection with pursuing this Motion to Compel against any CLEC which has, in the Commission's judgment, unreasonably delayed compliance with its Orders.

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY



One of Its Attorneys

Mark R. Ortlieb
Karl B. Anderson
AT&T Illinois
225 West Randolph Street
Floor 25D
Chicago, IL 60606
(312) 727-2928
(312) 727-2415

Theodore A. Livingston
John E. Muench
Demetrios G. Metropoulos
Courtney L. Anderson
Mayer, Brown, Rowe & Maw LLP
71 South Wacker Drive
Chicago, Illinois 60606
(312) 782-0600

CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **MOTION TO COMPEL COMPLIANCE WITH COMMISSION ORDER OF NOVEMBER 3, 2005** was served on the parties on the attached service list by U.S. Mail and/or electronic transmission on January 9, 2006.


Mark R. Ortlieb

SERVICE LIST FOR ICC DOCKET NO. 05-0442

Leslie D. Haynes
Administrative Law Judge
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
lhaynes@icc.illinois.gov

Terrance Hilliard
Administrative Law Judge
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
thilliard@icc.illinois.gov

John Riley
Administrative Law Judge
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
jriley@icc.illinois.gov

J.T. Ambrosi
PaeTec Communications, Inc.
One PaeTec Plaza
600 Willowbrook Office Park
Fairpoint, NY 14450
jt.ambrosi@paetec.com

Courtney Anderson, Theodore
Livingston, Demetrios Metropoulos
Mayer Brown Rowe & Maw
71 South Wacker Drive
Chicago, IL 60606
clanderson@mayerbrown.com
tlivingston@mayerbrown.com
demetro@mayerbrown.com

David Bolduc
Baker & Bolduc
3308 Bridle Path
Austin, TX 78703
dbolduc@saustin.rr.com

James Booth
OnFibert Communications, Inc.
6300 South Syracuse Way, Suite 350
Englewood, CO 80111
jbooth@onfiber.com

Eric Branfman, Paul Hudson
Swidler Berlin Shereff Friedman
3000 K Street, NW, Suite 300
Washington, DC 20007
ejbranfman@swidlaw.com
pbhudson@swidlaw.com

Lawrence Brenton, Patrick Crocker
Early Lennon Crocker & Bartosiewicz
900 Coamerica Building
Kalamazoo, MI 49007
lbrenton@earlylennon.com
tcoml@earlylennon.com

Edward Cadieux, Carol Keith
NuVox Communications of Illinois
16090 Swingley Ridge Road, Ste. 450
Chesterfield, MO 63017
ecadieux@nuvox.com
ckeith@nuvox.com

Jodi Caro
Looking Glass Networks, Inc.
1111 West 22nd Street, Suite 600
Oak Brook, IL 60523
jodi.caro@glass.net

Mary Cegelski
First Communications, LLC
3340 West Market Street
Akron, OH 44333
mcegelski@firstcomm.com

Torsten Clausen
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
tclausen@icc.state.il.us

Joseph E. Donovan, Henry T. Kelly,
Julie Musselman
Kelley Drye & Warren
333 East Wacker, Suite 2600
Chicago, IL 60601
jdonovan@kelleydrye.com
hkelly@kelleydrye.com
jmusselman@kelleydrye.com

Jerry Finefrock, Brad Shires
LDMI Telecommunications, Inc.
8801 Conant Street
Hamtramck, MI 49211
jfinefro@talk.com
bshires@talk.com

Ronald Gavillet
Neutral Tandem-Illinois, LLC
One South Wacker Drive, Suite 200
Chicago, IL 60606
rgavillet@neutraltandem.com

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

Karen Gillespie
Technologies Management Inc.
210 North Park Avenue
Winter Park, FL 32789
kgillespie@tminc.com

Stefanie Glover
Illinois Commerce Commission
160 North LaSalle Street, Suite C-800
Chicago, IL 60601
sglover@icc.illinois.gov

Michael Goldey
Telecommunications Analytica
81 Highfield Road
Harrison, NY 10528
m.goldey@mindspring.com

Thad Goretski
CIMCO Communications, Inc.
1901 South Meyers Road, Suite 700
Oakbrook Terrace, IL 60181
puc@cimco.net

William A. Haas
McLeodUSA Telecommunications
6400 C Street SW
Cedar Rapids, IA 52404
whaas@mcleodusa.com

Kristina Harris
Ascendtel, LLC
524 15th Street
Moline, IL 61255
kris@netexpress.net

Eric Harstad, M. Gavin McCarty
Globalcom, Inc.
333 West Wacker Drive, Suite 1500
Chicago, IL 60606
eharstad@callglobalcom.com
gmccarty@callglobalcom.com

Todd Hayes
King City Telephone, LLC d/b/a
Southern Illinois Communications
123 South 10th, Suite 506
Mount Vernon, IL 62864
thayes@siclink.com

Peter Healy
TDS Metrocom, LLC
525 Junction Road, Suite 6000
Madison, WI 53717
peter.healy@tdsmetro.com

David Huberman
Intrado, Inc.
1601 Dry Creek Drive
Longmont, CO 80503
dhuberman@intrado.com

Lori Kline
Technologies Management, Inc.
P.O. Drawer 200
Winter Park, FL 32790
lkline@tminc.com

Deborah Kuhn
MCI WorldCom
205 North Michigan, Suite 1100
Chicago, IL 60601
deborah.kuhn@mci.com

Adam Kupetsky
WilTel Communications, LLC
One Technology Center, TC 15H
Tulsa, OK 74103
adam.kupetsky@wiltel.com

Michael Lannon
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60601
mlannon@icc.illinois.gov

Mark Lieberman
Global TelData II, LLC
4646 Ravenswood
Chicago, IL 60640
mark.lieberman@globalteldata.com

Owen E. MacBride
Schiff Hardin & Waite
233 South Wacker, 6600 Sears Tower
Chicago, IL 60606
omacbride@schiffhardin.com

John McCaffrey, Kathleen Pasulka-
Brown
Foley & Lardner
321 North Clark, Suite 2800
Chicago, IL 60610
jmccaffrey@foleylaw.com
kpasulka-brown@foleylaw.com

Francie McComb
Talk America, Inc.
6805 Route 202
New Hope, PA 18938
fmccomb@talk.com

Elizabeth McDonald
US Xchange of Illinois, LLC
100 Chestnut Street, Suite 600
Rochester, NY 14604
emcdonald@choiceonecom.com

Becki Merkel
McLeodUSA Telecommunications
6400 C Street SW, P.O. Box 3177
Cedar Rapids, IA 52406
bmerkel@mcleodusa.com

Stephen J. Moore, Kevin D. Rhoda,
Thomas Rowland
Rowland & Moore
200 West Superior Street, Suite 400
Chicago, IL 60610
steve@telecomreg.com
krhoda@telecomreg.com
tom@telecomreg.com

Raymond Perea
NOS Communications, Inc.
4380 Boulder Highway
Las Vegas, NV 89121
rperea@nos.com

W. Joseph Price
Kelley Drye & Warren
1200 19th Street NW, Suite 500
Washington, DC 20036
jprice@kelleydrye.com

Jeffrey Ray
Citynet Illinois, LLC
113 Platinum Drive
Bridgeport, WV 26330
regulatory@citynet.net

Judith Riley
King City Telephone, LLC
2912 Lakeside Drive, Suite 100
Oklahoma City, OK 73120
jriley@telecompliance.net

David Rudd
Madison River Communications, LLC
625 South Second Street, Suite 103-D
Springfield, IL 62704
dorudd@aol.com

Kenneth Schifman
Sprint
MS: KSOPHN0212-2A303
6450 Sprint Parkway
Overland, KS 66251
kenneth.schifman@mail.sprint.com

Kurt Scholle
Novacon Holdings LLC
1895 Rohlwing Road, Suite C
Rolling Meadows, IL 60008
kscholle@novacon.net

Kristin Smith
Qwest Communications Corp.
1801 California Street, 10th Floor
Denver, CO 80202
kristin.smith@qwest.com

Kristen Smoot
RCN Telecom Services of Illinois
350 North Orleans Street, Suite 600
Chicago, IL 60654
kristen.smoot@rcn.net

Jeff Sobek
Access One, Inc.
820 West Jackson, 6th Floor
Chicago, IL 60607
jeffs@accessoneinc.com

Amy Thrasher
Globalcom Inc.
Technologies Management, Inc.
P.O. Drawer 200
Winter Part, FL 32790
athrasher@tminc.com

Mike Underdown
Citynet Illinois, LLC
3724 Saratoga Avenue
Downers Grove, IL 60515
mike.underdown@citynet.net

Tom Waterloo
Forte Communications, Inc.
1028 Hull Terrace
Evanston, IL 60202
tomw@fortephones.com

Russ Zuckerman
Mpower Communications Corp.
175 Sully's Trail, Suite 300
Pittsford, NY 14534
rzuckerman@mpowercom.com