

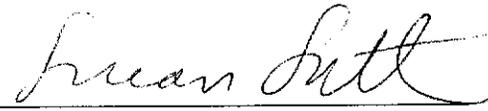


Company in northeast Illinois (the Chicago LATA) to be classified as competitive despite the acknowledgement that there are no competitive alternatives available to consumers of these telecommunications services, in violation of Section 13-502 and other sections of the PUA. 220 ILCS 5/13-502, *et al.*. The People's Petition for Review also seeks reversal of these Orders because the Commission erred as a matter of law and fact by adopting the terms of a proposal submitted by only two of ten parties to the docket as a settlement that are not supported by the record. The approved proposal violated the rules for Commission review of "settlements" to a Commission investigation or docket, as set forth by the Illinois Supreme Court in Business and Professional People for the Public Interest, 136 Ill.2d 192 (1989). The Orders at issue likewise are not supported by substantial evidence of the record, and do not contain findings or analysis sufficient to allow an informed judicial review, as set forth in the People's Application for Rehearing, filed with and denied by the Commission and incorporated herein by reference, and the People's Petition for Review, filed with the Illinois Appellate Court, First District, and attached as Exhibit A. The Commission also erred as a matter of law by rejecting the People's Application for Rehearing, thereby failing to reopen the record to take into account a recent United States District Court ruling granting Illinois Bell's request for summary judgment, and relieving IBT of its obligation to provide switching as an unbundled network element at regulated rates under Section 13-801 of the Act. 220 ILCS 5/13-801.

Dated: October 24, 2006

Respectfully submitted,

THE PEOPLE OF THE STATE OF ILLINOIS  
Lisa Madigan, Attorney General

By: 

Janice A. Dale,  
Chief, Public Utilities Bureau  
Susan L. Satter  
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**PROOF OF SERVICE**

Susan L. Satter, one of the attorneys for the People of the State of Illinois, hereby certifies that on October 24, 2006, she caused three copies of each of the foregoing Notice of Filing and Notice of Appeal to be filed with the Illinois Commerce Commission, through Elizabeth A. Rolando, its Chief Clerk, 527 E. Capitol Avenue, Springfield, Illinois 62706, and that she caused copies of each of the foregoing Notice of Filing and Notice of Appeal to be served on the persons at the addresses specified on the attached Service List by depositing such copies in the United States mail at or before 5:00 p.m., first class postage prepaid, from 100 West Randolph Street; Chicago, Illinois 60601.

A handwritten signature in cursive script, reading "Susan Satter", written over a horizontal line.

Susan L. Satter

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

PEOPLE OF THE STATE OF ILLINOIS, )  
Ex rel. LISA MADIGAN )  
ATTORNEY GENERAL OF THE STATE OF ILLINOIS )  
 )  
Petitioner-Appellant, )  
 )  
vs. ) Notice of Appeal  
 )  
ILLINOIS COMMERCE COMMISSION, ILLINOIS BELL ) Docket No. 06-0027  
TELEPHONE COMPANY, CITIZENS UTILITY BOARD, )  
CITY OF CHICAGO, COOK COUNTY STATE'S )  
ATTORNEY'S OFFICE, AARP ILLINOIS, GALLATIN )  
RIVER COMMUNICATIONS LLC, TRUCOMM )  
CORPORATION AND DATA NET SYSTEMS )  
 )  
Respondents – Appellees. )

**NOTICE OF FILING**

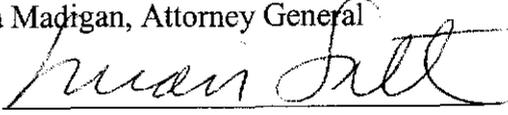
TO: Elizabeth A. Rolando, Chief Clerk All parties and persons on  
Illinois Commerce Commission attached Service List  
527 E. Capitol Ave.  
Springfield, Illinois 62706

PLEASE TAKE NOTICE that on October 24, 2006, Petitioner-Appellant the  
People of the State of Illinois filed with the Illinois Commerce Commission, through  
Elizabeth A. Rolando, its Chief Clerk, 527 E. Capitol Avenue, Springfield, Illinois  
62706, the original and three copies of the attached Notice of Appeal, a copy of which is  
hereby served upon you.

Dated: October 24, 2006

Respectfully submitted,

THE PEOPLE OF THE STATE OF ILLINOIS  
Lisa Madigan, Attorney General

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