

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA



**FILED**  
08-10-11  
10:41 AM

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INFOTELECOM, LLC ) )  
(U-6946-C) ) )  
 ) )  
Complainant, ) )  
 ) )  
v. ) Case C.11-07-021  
 ) )  
Pacific Bell Telephone Company ) )  
D/B/A AT&T California ) )  
(U-1001-C) ) )  
 ) )  
Defendant. ) )  
\_\_\_\_\_)

**JOINT MOTION TO STAY CASE DURING SETTLEMENT DISCUSSIONS**

Infotelecom, LLC (“Infotelecom”) (U6946C) and Pacific Bell Telephone Company D/B/A AT&T California (“AT&T California”) (U1001C), pursuant to Commission Rule 11.1, file this Joint Motion to Stay Case During Settlement Discussions. In support thereof, Infotelecom and AT&T California state as follows:

1. On July 25, 2011, Infotelecom filed a Complaint against AT&T California based on AT&T California’s Notice of Disconnection sent to Infotelecom and the Director of the Communications Division of the Commission on July 20, 2011. Infotelecom and AT&T California have had a dispute over the interpretation of certain provisions in their interconnection agreement (“ICA”). AT&T California’s Notice of Disconnection stated that AT&T California would terminate the ICA and disconnect service to Infotelecom on August 19, 2011.

2. Infotelecom and AT&T California, along with other AT&T entities that are not a part of this proceeding, are involved in other litigation in federal court. *See Infotelecom, LLC v. Illinois Bell Telephone Company d/b/a AT&T Illinois, et al*, No. 3:11-cv-0739 (JCH) (D. Conn.);

*Infotelecom, LLC v. Illinois Bell Telephone Company d/b/a AT&T Illinois, et al*, No. 11-2916 (2d Cir.). Additionally, Infotelecom and other AT&T entities are or may be involved in proceedings at other state utility commissions.

3. Since Infotelecom filed the Complaint, the parties have engaged in productive settlement discussions to resolve their dispute for all proceedings. The parties have now agreed that it would be desirable to focus exclusively on those conversations and to temporarily suspend further litigation activities.

4. As a result, AT&T California has agreed to retract its 30-day disconnection notice and agreed that it will provide, at a minimum, a further 15-day notice of disconnection if it subsequently determines that settlement discussions are unlikely to prove fruitful before taking any action to disconnect service to Infotelecom in California or any other state.

5. Accordingly, Infotelecom and AT&T California hereby move the Commission to stay the proceeding and to suspend any requirement that Infotelecom may have to inform its customer of AT&T California's notice of disconnection. The Commission has not yet instructed AT&T California to answer the Complaint, and Infotelecom and AT&T California request that it forbear from doing so or taking any other action relating to Infotelecom's disconnection until further notice by the parties.

Dated: August 9, 2011

Respectfully submitted,

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