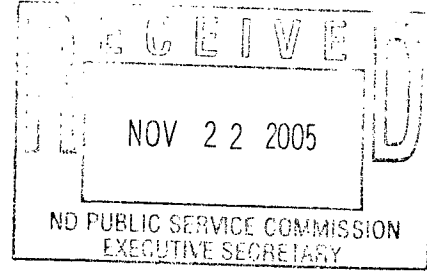


BEFORE THE PUBLIC SERVICE COMMISSION OF NORTH DAKOTA

BEK Communications Cooperative,)
 Consolidated Telcom, Dakota Central)
 Telecommunications Cooperative, Dickey)
 Rural Telephone Cooperative, Griggs)
 County Telephone Company, Inter-Community)
 Telephone Company, LLC, Missouri Valley)
 Communications, Inc., Moore and Liberty)
 Telephone Company, Nemont Telephone)
 Cooperative, Inc., North Dakota Telephone)
 Company, Northwest Communications)
 Cooperative, Polar Communications Mutual)
 Aid Corporation, and Reservation Telephone)
 Cooperative,)
 Complainants,)
 vs.)
 SmartNET, Inc., d/b/a CallSmart,)
 Respondent.)



Case No. PU-2967-03-666

**BRIEF IN SUPPORT
OF MOTION TO
AMEND COMPLANT**

The Complainants have moved to amend their Complaint to add Consolidated Communications Networks, Inc., an affiliate of Consolidated Telcom, as an additional complainant party to this action.

Rule 15(a) of the North Dakota Rules of Civil Procedure provides that:

A party's pleading may be amended only by leave of court or by written consent of the adverse party; and leave shall be freely given when justice so requires.

Rule 15(a) places no restriction on the type of amendments that may be made to the pleadings. The amendment may even change the theory of the case or the nature of the action. Perdue v. Knutson, 179 N.W.2d 416 (N.D. 1970). That is certainly not the case here however. The Complainants merely wish to add a party to assure all interested entities are parties to this action.

The proposed Amended Complaint would have no prejudicial impact upon the Respondent, and the Complainants respectfully request the Court to grant the motion to amend the Complaint.

Dated this 21st day of November, 2005.

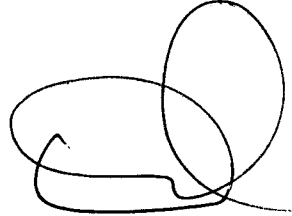

PRINGLE & HERIGSTAD, P.C.

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Fax: (701) 857-1361
pringle@ndak.net
Attorney for Complainants

CERTIFICATE OF SERVICE

A true and correct copy of the foregoing Notice of Motion to Amend Complaint, Motion to Amend Complaint, and Brief in Support of Motion to Amend Complaint was served by mail on the 21st day of November, 2005, on the following:

Bruce A. Selinger
KUBIK, BOGNER, RIDL & SELINGER
26 East Third Street
P.O. Box 1173
Dickinson, ND 58602-1173

A handwritten signature in black ink, consisting of several overlapping loops and a horizontal stroke at the bottom.

Don Negaard, ND Bar ID #03598