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June 9, 2005

**FILED<sup>4</sup>**

**JUN 09 2005**

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Missouri Public  
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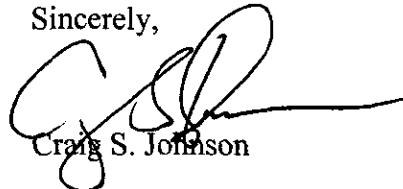
**Re: In the Matter of the Petition of Mid-Missouri Telephone Company for  
Arbitration of Unresolved Issues. Case No. IO-2005-0470.**

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Motion to Consolidate.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:sjo

Enclosure

CC: PSC General Counsel  
OPC General Counsel  
Dan Menser

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**FILED<sup>4</sup>**

**JUN 09 2005**

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

**Missouri Public  
Service Commission**

**In the Matter of the Petition of )  
Mid-Missouri Telephone Company )  
for Arbitration of Unresolved ) Case No. IO-2005-0470  
Issues Pertaining to a Section 251(b)(5) )  
Agreement with T-Mobile USA, Inc. )**

**MOTION TO CONSOLIDATE**

Comes now Petitioner and hereby moves the Commission to consolidate the following Petitions for Arbitration between individual MITG company members and T-Mobile USA, Inc.:

IO-2005-0468	Alma Telephone Company
IO-2005-0470	Mid-Missouri Telephone Company
IO-2005-0471	Chariton Valley Telephone Corporation
IO-2005-0469	Northeast Missouri Rural Telephone Company

In Support of this Motion, Petitioner states as follows:

1. The above named four companies associate themselves for Missouri regulatory purposes as the Missouri Independent Telephone Group, or MITG.
2. Respondent T-Mobile USA, Inc. simultaneously requested interconnection negotiations with the above four MITG companies.
3. The MITG companies have conducted negotiations as a group with T-Mobile USA, Inc..

4. T-Mobile USA, Inc. has conducted negotiations with the MITG companies as a group.

5. Conducting arbitrations simultaneously benefits both the MITG companies and T-Mobile USA, Inc. in conducting a single arbitration instead of separate arbitrations, in that it saves time, expense, and other resources.

6. The MITG companies on June 7, 2005 filed separate petitions for arbitrations against T-Mobile USA, Inc. in that the Commission arbitration rules, and federal interconnection agreement approval rules, contemplate each agreement as being between the requesting carrier and the ILEC.

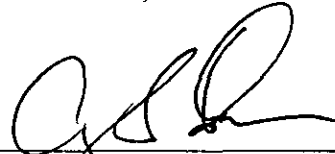
7. Consolidating these four petitions for arbitration will allow the MITG and T-Mobile USA, Inc. to continue to negotiate and arbitrate in a single venue, as opposed to having to conduct four separate arbitrations. This will continue to allow the MITG and T-Mobile USA, Inc. the efficiencies and savings in time, expense, and other resources associated with a single arbitration.

8. Consolidating these four petitions for arbitration will allow the Commission to appoint a single arbitrator and a single set of advisors, avoiding the administrative difficulty of conducting four separate arbitration proceedings. It will also avoid or minimize the risk of inconsistent arbitration results if these four individual petitions were conducted as separate proceedings. It will also simplify the Commission's calendar by having a single procedural schedule instead of four separate schedules.

WHEREFORE, on the basis of the foregoing, Petitioner requests that the above four arbitration proceedings be consolidated into a single proceeding.

ANDERECK, EVANS, MILNE, PEACE  
& JOHNSON, L.L.C.

By



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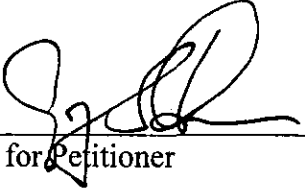
**CERTIFICATE OF SERVICE**

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 9 day of June, 2005, to the following representatives of Staff, OPC, and Respondent:

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