

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Petition for Arbitration of	)	
Unresolved Issues in a § 251(b)(5)	)	Case No. TO-2006-0147
Agreement with T-Mobile USA, Inc.	)	

**Joint Motion for Extension of Time to File**  
**Interconnection Agreement**

Come now Petitioners<sup>1</sup> and Respondent, T-Mobile USA, Inc. ("T-Mobile")(collectively "Joint Movants"), and for their Joint Motion for Extension of Time to File Interconnection Agreements, state as follows to the Missouri Public Service Commission ("Commission"):

1. On March 23, 2006, the Commission issued its Arbitration Order in the above-referenced case which approved the Final Arbitration Report filed on March 3, 2006, and directed Joint Movants to incorporate the Commission's resolution of each contested issue into their Interconnection Agreements and file their Interconnection Agreements no later than April 22, 2006. In addition, the Commission directed its Staff to file a Memorandum and Recommendation advising the Commission that it has reviewed each such proposed Interconnection Agreement and determine that it complies with this order and applicable statutes no later than May 22, 2006. Subsequently, at the request of Joint Movants, the Commission extended the deadline to file the Interconnection Agreements to May 22, 2006.

2. Joint Movants are in the process of creating "final" Interconnection Agreements that incorporate the Commission's decisions on each of the contested issues but

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<sup>1</sup>BPS Telephone Company, Cass County Telephone Company, Citizens Telephone Company of Higginsville, MO, Craw-Kan Telephone Cooperative, Inc., Ellington Telephone Company, Farber Telephone Company, Granby Telephone Company, Grand River Mutual Telephone Corporation, Green Hills Telephone Corporation, Holway Telephone Company, Iamo Telephone Company, Kingdom Telephone Company, KLM Telephone Company, Lathrop Telephone Company, Le-Ru Telephone Company, Mark Twain Rural Telephone Company, McDonald County Telephone Company, Miller Telephone Company, New Florence Telephone Company, Oregon Farmers Mutual Telephone Company, Peace Valley Telephone Company, Inc., Rock Port Telephone Company and Steelville Telephone Exchange, Inc.

because of the press of other matters have not been able to complete this task and file same with the Commission.

3. The Joint Movants expect that they will be able to produce such a final Agreement and file same with the Commission no later than June 22, 2006, and request that the Commission extend the deadline accordingly.

4. Additionally, to the extent the Staff of the Commission has been directed to review each finalized Interconnection Agreement and file a Memorandum and Recommendation regarding same, Joint Movants further request that the deadline for Staff to do so be extended to thirty (30) days beyond the date on which each Interconnection Agreement is filed.

5. If the Commission extends the deadline as requested herein, each of the Joint Movants hereby promises, covenants and agrees not to appeal the Commission's decision in this case on the basis that the Joint Movants or the Commission failed to act within the time periods established by Section 47 U.S.C. 252.

WHEREFORE, Joint Movants respectfully request the Commission to extend the deadline for filing Interconnection Agreements in accordance with the Arbitration Order as requested herein and for such other orders as are appropriate in the circumstances.

Respectfully submitted,

/s/W.R. England, III

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### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or via electronic mail, or hand-delivered on this 18<sup>th</sup> day of May, 2006, to the following parties:

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