

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

ATTORNEYS AT LAW

EUGENE E. ANDERECK

TERRY M. EVANS

ERWIN L. MILNE

JACK PEACE

CRAIG S. JOHNSON

RODRICA A. WIDGER

GEORGE M. JOHNSON

BEVERLY J. FIGG

WILLIAM S. LEWIS

VICTOR S. SCOTT

COREY K. HERRON

700 EAST CAPITOL AVENUE

COL. DARWIN MARMADUKE HOUSE

P.O. BOX 1438

JEFFERSON CITY, MISSOURI 65102-1438

TELEPHONE 573-634-3422

FAX 573-634-7822

MATTHEW M. KROHN

LANETTE R. GOOCH

SHAWN BATTAGLER

ROB TROWBRIDGE

JOSEPH M. PAGE

LISA C. CHASE

JUDITH E. KOEHLER

ANDREW J. SPORLEDER

June 9, 2005

FILED⁴

JUN 09 2005

OF COUNSEL

MARVIN J. SHARP

PATRICK A. BAUMHOER

GREGORY C. STOCKARD (1904-1993)

PHIL HAUCK (1924-1991)

Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Missouri Public
Service Commission

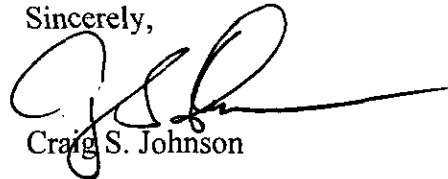
Re: In the Matter of the Petition of Northeast Missouri Rural Telephone Company for Arbitration of Unresolved Issues. Case No. IO-2005-0469.

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

TRENTON OFFICE
9th AND WASHINGTON
P.O. BOX 547
TRENTON, MISSOURI 64683-0547
660-359-2244
FAX 660-359-2116

SPRINGFIELD OFFICE
1111 S. GLENSTONE
P.O. BOX 4929
SPRINGFIELD, MISSOURI 65808-4929
417-864-6401
FAX 417-864-4967

PRINCETON OFFICE
207 NORTH WASHINGTON
PRINCETON, MISSOURI 64673
660-748-2244
FAX 660-748-4405

SMITHVILLE OFFICE
119 E. MAIN STREET
P.O. BOX 654
SMITHVILLE, MISSOURI 64089
816-532-3895
FAX 816-532-3899

FILED⁴

BEFORE THE PUBLIC SERVICE COMMISSION JUN 09 2005
STATE OF MISSOURI

Missouri Public
Service Commission

In the Matter of the Petition of)
Northeast Missouri Rural Telephone)
Company for Arbitration of Unresolved) Case No. IO-2005-0469
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



Craig S. Johnson MO Bar No. 28179
The Col. Darwin Marmaduke House
700 East Capitol
P.O. Box 1438
Jefferson City, MO 65102-1438
Telephone: (573) 634-3422
Fax: (573) 634-7822
ATTORNEY FOR PETITIONER

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:

General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael F. Dandino
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Dan Menser
Counsel
T-Mobile USA Inc.
12920 S.E. 8th St.
Bellevue, WA 98006



Attorney for Petitioner