

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

In the Matter of the Application of Sprit)
Nextel Corporation for Approval of the)
Transfer of Control of Sprint Missouri,)
Inc., Sprint Long Distance, Inc., and)
Sprint Payphone Services, Inc. from)
Sprint Nextel Corporation to LTD)
Holding Company)

Case No. IO-2006-0086

STAFF RESPONSE AND MOTION

COMES NOW the Staff of the Public Service Commission, and in response to the Commission's *Order Directing Staff File a Recommendation* and additionally, as its *Motion*, states:

1. On August 23, 2005, Sprint Nextel Corporation filed an application seeking approval of the transfer of control of Sprint Missouri, Inc., Sprint Long Distance, Inc., and Sprint Payphone Services, Inc. from Sprint Nextel Corporation to LTD Holding Company.

2. However, only Sprint Nextel Corporation is a party to this case among the parties involved in the transaction. Although LTD Holding Company is a party to the underlying agreement, it did not join in the application. Because Staff believes LTD Holding Company is a necessary party to a full and fair adjudication of this matter, Staff moves that the Commission add LTD Holding Company as a party to this case.

3. Staff has commenced its investigation of the application in this matter. However, Staff requests that the Commission permit it to file its recommendation on or before November 15, 2005 rather than the ordered date of October 28, 2005. In its Order, the Commission specifically observed that Staff could request additional time if it is unable to offer its recommendation by the initially-ordered date. Staff proposes the November 15, 2005

submission date based on the presumption that Sprint Nextel Corporation will respond as quickly as possible to any discovery requests the Staff may submit.

WHEREFORE, Staff requests that the Commission make LTD Holding Company a party to this case, and permit its Staff to file its Recommendation in this matter on or before November 15, 2005.

Respectfully submitted,

DANA K. JOYCE
General Counsel

/s/ David A. Meyer

David A. Meyer
Senior Counsel
Missouri Bar No. 46620

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
david.meyer@psc.mo.gov

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 5th day of October 2005.

/s/ David A. Meyer