

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the Matter of the Petition for Arbitration)	<u>Case No. TO-2006-0147</u>
Of Unresolved Issues in a Section 251(b)(5))	consolidated with
Agreement with Cingular)	Case No. TO-2006-0151

Motion for Leave to File
Conformed Agreement Out of Time

Comes now Petitioner Seneca Telephone Company (“Petitioner”) and requests the Missouri Public Service Commission (“Commission”) to accept the filing of Petitioner’s Notice of Filing of Conformed Agreement including the Petitioner’s agreement with Cingular Wireless LLC, (“Cingular”) out of time. In support of the request, Petitioner states as follows to the Commission:

The Commission issued its Arbitration Order on March 23, 2006, in the above-referenced consolidated case approving the Final Arbitration Report filed on March 3, 2006. The Commission directed the parties to incorporate the Commission’s resolution of each contested issue into their Interconnection Agreements and to file the agreements no later than April 22, 2006. Following joint requests of the parties, the Commission extended the deadline to file the interconnection agreements until June 22, 2006.

Petitioner and Cingular have conferred and finalized a “template” interconnection agreement. The individual agreements for a large group of companies have now been finalized and filed.

The extensive process of executing the interconnection agreements involved preparing twenty-six interconnection agreements with Cingular (and twenty-three additional agreements with T-Mobile USA) with several unique provisions including the terms, rates, and circumstances. The process also included transmitting the agreements for signature to numerous locations, including several remote locations of the Petitioner's group of small Missouri rural telephone companies.

Cingular does not object to this request and joins in this request to the Commission.

WHEREFORE, the Petitioner respectfully requests this Commission to accept the Notice of Filing of Conformed Agreement and the attached agreement between Petitioner and Cingular out of time and for such other orders as the Commission deems appropriate.

Respectfully submitted,

/s/ W.R. England, III
W.R. England, III Mo. 23975
Brian T. McCartney Mo. 47788
M. Melissa Manda Mo. 39691
BRYDON, SWEARENGEN & ENGLAND P.C.
312 E. Capitol Ave., P.O. Box 456
Jefferson City, MO 65102
trip@brydonlaw.com
bmccartney@brydonlaw.com
mmanda@brydonlaw.com
Phone: (573) 635-7166
Fax: (573) 635-0427

Attorneys for Petitioner

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was sent by U.S. Mail, postage prepaid, or via electronic mail, or hand-delivered on this 26th day of June, 2006, to the following representatives of Respondent.

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

Lewis Mills
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

John Paul Walters, Jr.
15 E. 1st Street
Edmond, OK 73034
pwalters@sbcglobal.net

/s/W.R. England, III