

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

Application of Sprint Nextel Corporation for)
Approval of the Transfer of Control of Sprint) Case No. IO-2006-0086
Missouri, Inc., Sprint Long Distance, Inc., and)
Sprint Payphone Services, Inc. from Sprint Nextel)
Corporation to LTD Holding Company)

**MOTION OF SPRINT NEXTEL CORPORATION TO STRIKE AMENDED
OBJECTION OF COMMUNICATIONS WORKERS OF AMERICA**

COMES NOW Sprint Nextel Corporation (“Sprint”) by and through its counsel and hereby moves to strike the Amended Objection to the Non-Unanimous Stipulation and Agreement filed by the Communications Workers of America (“CWA”) on January 10, 2006.

I. On December 27, 2005 all parties to this proceeding other than CWA filed a Stipulation and Agreement to resolve fully the issues in this proceeding. On January 3, 2006 CWA timely filed its Objection to the Stipulation and Agreement pursuant to 4CSR240-2.115(2). A week later, and without seeking leave of the Commission or contacting Sprint or other parties to seek their agreement, CWA filed its Amended Objection setting forth different objections and arguments opposing the Stipulation and Agreement.

II. Pursuant to 4 CSR 240-2.115(2)(B), CWA was required to file any objection to the Stipulation Agreement within seven days. CWA’s initial Objection was timely filed and Sprint addressed that Objection in its surrebuttal testimony filed January 12, 2006. By late filing an Amended Objection on January 10, 2006¹ contrary to the Commission’s Rules,

¹ The Amended Objection was filed at approximately 4:30 PM on January 10th, however, due to technical issues with EFIS; Sprint did not receive notification of the filing till after its testimony had been filed on January 12th.

CWA has prejudiced the interests of Sprint and denied Sprint a full opportunity to respond to CWA's objection. Further, the Amended Objection contains well over a page of additional argument not in the original Objection. The initial Objection was timely filed pursuant to the Commission rules and served its procedural purpose, CWA should not now be allowed to enhance and revise its objection after the fact and in an untimely manner.

Wherefore, Sprint moves to strike the Amended Objection of CWA as untimely and prejudicial to Sprint.

Respectfully submitted,



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 18th day of January 2006, a copy of the foregoing Motion was served via electronic mail to each of the following:

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A handwritten signature in cursive script, appearing to read "Paul G. [unclear]", is written over a horizontal line.