

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

In the Matter of the Petition of)	
Alma Telephone Company)	
for Arbitration of Unresolved)	Case No. IO-2005-0468, et al.
Issues Pertaining to a Section 251(b)(5))	(consolidated)
Agreement with T-Mobile USA, Inc.)	

**MOTION OF T-MOBILE FOR LEAVE TO REPLY TO COMMENTS OF
SMALL TELEPHONE COMPANY GROUP**

Comes now T-Mobile, USA, Inc. ("T-Mobile"), pursuant to Commission Rule 4 CSR 240-36.040(20), and respectfully requests leave to reply to the comments filed by the Small Telephone Company Group ("STCG") on September 19, 2005. T-Mobile files its Reply with this Motion. In support of this Motion, T-Mobile states the following:

1. The parties to this Arbitration filed their Comments concerning the Arbitrator's Draft Report on Friday, September 16, 2005, consistent with the procedural schedule which calls for the Arbitrator to issue his Final Report on September 23. On Monday, September 19, the STCG filed comments, slipping within the ten-day period in which members of the public may file comments on the Draft Report.

2. As the Reply filed with this Motion demonstrates, the STCG comments contain factual and legal inaccuracies which could mislead the Arbitrator. T-Mobile requests leave to reply to those comments, to give the Arbitrator a full opportunity to evaluate the arguments raised by the STCG. The Reply does not restate or reargue points already raised by T-Mobile.

3. The proposed Reply is not filed for purposes of delay, but rather to allow the Arbitrator to evaluate the accuracy of the points raised by the STCG.

Wherefore, T-Mobile respectfully requests that the Arbitrator grant its Motion to file a reply to the STCG comments in this proceeding.

Respectfully submitted,

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Certificate of Service

I hereby certify that a true and final copy of the foregoing was served via electronic transmission on this 21st day of September, 2005, to the following counsel of record:

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