BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Mid-Missouri Telephone Company,)
Petitioner,)
v.) Case No. TC-2006-0127
Southwestern Bell Telephone Company,)
T-Mobile USA, Inc.)
Respondents.)

SBC MISSOURI'S OPPOSITION TO MOTION TO CONSOLIDATE

SBC Missouri, ¹ respectfully requests the Missouri Public Service Commission ("Commission") to deny Mid-Missouri Telephone Company's ("Mid-Missouri's")

Motion to Consolidate this new complaint into Case No. TC-2002-57, which has already been heard, fully briefed and submitted for final Commission determination.

- 1. On October 27, 2005, Mid-Missouri filed a Motion to Consolidate this case into Case No. TC-2002-57. This Motion appears to be identical to the Motion to Consolidate Mid-Missouri previously filed with its Complaint and served on SBC Missouri on September 23, 2005.
- 2. SBC Missouri filed an Opposition to the previous Motion to Consolidate on October 3, 2005. Since SBC Missouri's October 3, 2005, Opposition fully addresses Mid-Missouri's newly filed Motion to Consolidate, SBC Missouri incorporates its prior response by reference into this pleading.

¹ Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, will be referred to in this pleading as "SBC Missouri" or "SBC."

WHEREFORE, SBC Missouri respectfully requests the Commission to deny

Mid-Missouri's Motion to consolidate its new complaint into Case No. TC-2002-57.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P. D/B/A SBC MISSOURI

BY Lw Ml	
PAUL G. LANE	#27011
LEO J. BUB	#34326
ROBERT J. GRYZMALA	#32454
MIMI B. MACDONALD	#37606
Attorneys for SBC Missouri	
One SBC Center, Room 3520	
St. Louis, Missouri 63101	
314-235-2508 (Telephone); 314-2	247-0014(Fax)
leo.bub@sbc.com	

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on November 7, 2005.

Leo J. Bub

General Counsel
David Meyer
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
gencounsel@psc.mo.gov
david.meyer@psc.mo.gov

Dan Menser Director-Legal Affairs T-Mobile USA, Inc. 12920 SE 38th Street Bellevue, WA 98006 dan.menser@t-mobile.com

Mark P. Johnson Sonnenschein, Nath & Rosenthal 4520 Main Street, Suite 1100 Kansas City, MO 64111 mjohnson@sonnenschein.com Public Counsel
Michael F. Dandino
Office of The Public Counsel
P.O. Box 2230
Jefferson City, MO 65102
mike.dandino@ded.mo.gov
opcservice@ded.mo.gov

Craig S. Johnson 1648-A East Elm Street Jefferson City, MO 65101 <u>craig@csjohnsonlaw.com</u>