

ANDERECK, EVANS, MILNE, PEACE & JOHNSON, L.L.C.

ATTORNEYS AT LAW

ERWIN L. MILNE
CRAIG S. JOHNSON
BEVERLY J. FIGG
VICTOR S. SCOTT

700 EAST CAPITOL AVENUE
COL. DARWIN MARMADUKE HOUSE
P.O. BOX 1438
JEFFERSON CITY, MISSOURI 65102-1438
TELEPHONE 573-634-3422
FAX 573-634-7822

LANETTE R. GOOCH
JOSEPH M. PAGE
LISA C. CHASE
ANDREW J. SPORLEDER
JASON A. PAULSMEYER
BRYAN D. LADE

April 21, 2005

FILED³

APR 21 2005

GREGORY C. STOCKARD (1904 - 1993)

PHIL HAUCK (1924 - 1991)

Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

Missouri Public
Service Commission

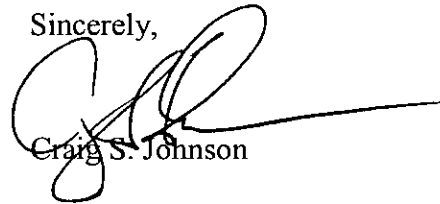
**Re: In the Matter of the Petition of MoKan Dial, Inc. Telephone Company for
Arbitration of Unresolved Issues. Case No. TO-2005-0379.**

Dear Secretary:

Enclosed for filing please find an original and eight (8) copies of the Motion To Consolidate.

Thank you for seeing this filed.

Sincerely,



Craig S. Johnson

CSJ:sjo

CC: PSC General Counsel
Michael Dandino
James Nauman
G. Darryl Reed
Bret Dublinske
MoKan Dial, Inc. Telephone Company

Trenton Office

9th AND WASHINGTON
P.O. BOX 547
TRENTON, MISSOURI 64683-0547
660-359-2244
FAX 660-359-2116

Springfield Office

OFFICE
1111 S. GLENSTONE
P.O. BOX 4929
SPRINGFIELD, MISSOURI 65808-4929
417-864-6401
FAX 417-864-4967

Princeton Office

PRINCETON OFFICE
207 NORTH WASHINGTON
PRINCETON, MISSOURI 64673
660-748-2244
FAX 660-748-4405

Smithville Office

SMITHVILLE OFFICE
119 E. MAIN STREET
P.O. BOX 654
SMITHVILLE, MISSOURI 64089
816-532-3895
FAX 816-532-3899

BEFORE THE PUBLIC SERVICE COMMISSION **APR 21 2005**
STATE OF MISSOURI

**In the Matter of the Petition of
MoKan Dial, Inc. Telephone Company
for Arbitration of Unresolved
Issues Pertaining to a Section 251(b)(5)
Agreement with United States Cellular
Corporation.**

Comes now Petitioner and hereby moves the Commission to consolidate the following Petitions for Arbitration between individual MITG company members and United States Cellular Corporations:

In Support of this Motion, Petitioner states as follows:

- 1

3. The MITG companies have conducted negotiations as a group with US Cellular.
4. US Cellular has conducted negotiations with the MITG companies as a group.
5. Conducting negotiations simultaneously benefits both the MITG companies and US Cellular in conducting a single negotiation instead of separate negotiations, in that it saves time, expense, and other resources.
6. The MITG companies on April 20, 2005 filed separate petitions for arbitrations against US Cellular in that the Commission arbitration rules, and federal interconnection agreement approval rules, contemplate each agreement as being between the requesting carrier and the ILEC.
7. Consolidating these six petitions for arbitration will allow the MITG and US Cellular to continue to negotiate and arbitrate in a single venue, as opposed to having to conduct six separate arbitrations. This will continue to allow the MITG and US Cellular the efficiencies and savings in time, expense, and other resources associated with a single arbitration.
8. Consolidating these six petitions for arbitration will allow the Commission to appoint a single arbitrator and a single set of advisors, avoiding the administrative difficulty of conducting six separate arbitration proceedings. It will also avoid or minimize the risk of inconsistent arbitration results if these six individual petitions were conducted as separate proceedings. It will also simplify the Commission's calendar by having a single procedural schedule instead of six separate schedules.

WHEREFORE, on the basis of the foregoing, Petitioner requests that the above six arbitration proceedings be consolidated into a single proceeding.

ANDERECK, EVANS, MILNE, PEACE
& JOHNSON, L.L.C.

By



Craig S. Johnson MO Bar No. 28179
The Col. Darwin Marmaduke House
700 East Capitol
P.O. Box 1438
Jefferson City, MO 65102-1438
Telephone: (573) 634-3422
Fax: (573) 634-7822
ATTORNEYS FOR PETITIONER

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 21st day of April, 2005, to the following representatives of Staff, OPC, and Respondent:

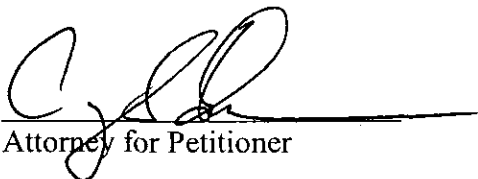
General Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Michael F. Dandino
Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

James Nauman
Senior Director-National Networks
U.S. Cellular
8410 West Bryn Mawr Ave
Chicago, IL 60631-3486

G. Darryl Reed
Sidley Austin Brown & Wood LLP
Bank One Plaza
10 S. Dearborn St.
Suite 5400 SW
Chicago, IL 60603

Bret Dublinske
Dickinson Mackaman Tyler & Hagen
1600 Hub Tower
699 Walnut St.
Des Moines, Iowa 50309



Attorney for Petitioner