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April 21, 2005

FILED³

APR 21 2005

GREGORY C. STOCKARD (1904 - 1993)

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Secretary/Chief Administrative Law Judge
Missouri Public Service Commission
P. O. Box 360
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Missouri Public
Service Commission

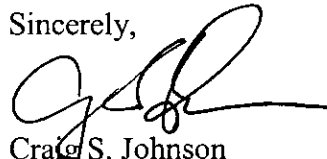
**Re: In the Matter of the Petition of Mid-Missouri Telephone Company for
Arbitration of Unresolved Issues. Case No. TO-2005-0376.**

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
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James Nauman
G. Darryl Reed
Bret Dublinske
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BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³

APR 21 2005

Missouri Public
Service Commission

In the Matter of the Petition of)
Mid-Missouri Telephone Company)
for Arbitration of Unresolved)
Issues Pertaining to a Section 251(b)(5))
Agreement with United States Cellular)
Corporation.)

Case No. TO-2005-0376

MOTION TO CONSOLIDATE

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:

TO-2005-0374	Chariton Valley Telephone Corporation
TO-2005-0375	Northeast Missouri Rural Telephone Company
TO-2005-0376	Mid-Missouri Telephone Company
TO-2005-0377	Choctaw Telephone Company
TO-2005-0378	Alma Telephone Company
TO-2005-0379	MoKan Dial Inc.

In Support of this Motion, Petitioner states as follows:

1. The above named six companies affiliate themselves for Missouri regulatory purposes as the Missouri Independent Telephone Group, or MITG.
2. Respondent US Cellular simultaneously requested interconnection negotiations with the above six MITG companies.

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.

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& JOHNSON, L.L.C.

By 

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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:


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