

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

Application of Lathrop Telephone Company)	
for Approval of an Agreement under)	
the Telecommunications Act of 1996.)	Case No. <u>TK-2004-0191</u>
)	

SPRINT SPECTRUM L.P. RESPONSE TO MOTION TO INTERVENE

COMES NOW, Sprint Spectrum L.P., d/b/a Sprint (hereinafter "Sprint"), and hereby responds to the motion for clarification filed by the Lathrop Telephone Company ("Lathrop"):


Sprint has no objection to Lathrop's Motion for Clarification to the extent it requests the Commission to clarify its order Approving Interconnection Agreement to reflect that the rural exemption provided in Section 251(f) (1) of the Federal Act is not removed. Sprint would object if Lathrop intends its request for clarification to also capture the rural exemption contained in Section 251(f)(2) of the Federal Act. The exemption in Section 251(f)(2) only applies after the Commission makes an affirmative finding consistent with the specific requirements of the section upon the petition of a local exchange carrier. Lathrop has not filed such a petition, nor submitted evidence upon which the Commission can make the necessary determinations. Therefore, it is Sprint's understanding that Lathrop's requests does not extend to the rural exemption contained in Section 251(f)(2).

Based on the above, Sprint has no objection to Lathrop's Motion for Clarification to the extent it requests the Commission to clarify its order Approving Interconnection

Agreement to reflect that the rural exemption provided in Section 251(f) (1) of the Federal Act is not removed.

Respectfully submitted,

Sprint Missouri, Inc. (Sprint)



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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by first-class/electronic/facsimile mail, this 10th day of December, 2003.

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