

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

In the Matter of CenturyTel of Missouri, LLC's)
Request for Competitive Classification Pursuant to) Case No. IO-2006-0109
Section 392.245.5, RSMo (2005).)

**VERIFIED PLEADING OF T-MOBILE CONCERNING CUSTOMERS
IN SUBJECT EXCHANGES**

Comes now T-Mobile USA, Inc. ("T-Mobile"), by its undersigned attorneys, and in response to the Commission's Order of September 22, 2005, states the following:

1. In Missouri, T-Mobile provides commercial mobile radio services through the following operating entities: VoiceStream PCS II Corporation, VoiceStream Kansas City, Inc., and Powertel/Memphis, Inc., doing business as T-Mobile, – which, for the purposes of this pleading, shall be referred to collectively as T-Mobile. With respect to the Commission's Order, T-Mobile responds as follows:

2. T-Mobile objects on the basis that the Commission has no jurisdiction to regulate wireless carriers or the services they provide, or to join T-Mobile as a party in this proceeding. T-Mobile also does not concede that it is providing "basic local telecommunications service," as defined in Ch. 392.245.2, RSMo 2005, for the purposes of the competitive analysis the Commission must perform in this case.

3 Without waiving and subject to the foregoing objections, T-Mobile responds as follows. T-Mobile does not have customers in the Bourbon exchange/rate center. With respect to the Branson, Columbia, O'Fallon and Wentzville exchanges/rate centers, T-Mobile has numbering resources assigned to customers in these exchanges/rate centers. However, due to the short deadline given to respond to the Order, T-Mobile has not confirmed whether at least two customers have addresses in these exchanges/rate centers.

4. With respect to the Dardenne, St. Peters, Cuba and St. James exchanges/rate centers, T-Mobile does not have numbering resources assigned by the North American Numbering Administrator nor the Pooling Administrator from these exchanges/rate centers. However, pursuant the Federal Communication Commission's local number portability rules, a small number of customers have ported in their telephone numbers from other carriers and the above referenced exchanges/rate centers to T-Mobile since its coverage area overlaps the geographic location of the rate center in which the customers' wireline numbers are provisioned. *See In Re Telephone Number Portability, CC Docket No. 95-116, FCC 03-284, ¶ 22.*

5. Because T-Mobile does not typically distinguish between residential and business customers, it cannot state that it has at least two business and two residential customers in each of the exchanges/rate centers listed above.

Respectfully submitted,

/s/ Mark P. Johnson
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ATTORNEYS FOR T-MOBILE USA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 27th day of September, 2005, on all parties of record.

/s/Mark P. Johnson
Mark P. Johnson

VERIFICATION

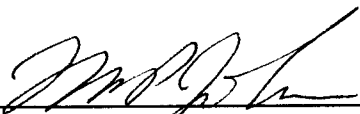
STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

Comes now Mark P. Johnson, being of lawful age and duly sworn, who swears and affirms as follows:

1. My name is Mark P. Johnson, and I am an attorney for T-Mobile USA, Inc. I have been authorized by T-Mobile to verify the foregoing on its behalf.

2. I have read the foregoing, and its contents are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.



Mark P. Johnson

Subscribed and sworn to before me this 27 day of September, 2005.



Notary Public

My commission expires:

<p>TAMMY L. TROUTNER Notary Public - Notary Seal STATE OF MISSOURI Commissioned for Clay County My Commission Expires: Jan. 26, 2009 Commission Number 05481268</p>
