

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

Application of USCOC of Greater Missouri, LLC for            )  
Designation as an Eligible Telecommunications Carrier        )  
Pursuant to the Telecommunications Act of 1996                )        **Case No. TO-2005-0384**

**U.S. CELLULAR’S RESPONSE TO  
STAFF’S SUGGESTIONS IN OPPOSITION**

1.       On September 20, 2006, the Commission requested Staff file a response to AT&T Missouri’s motion to reclassify a certain confidentially marked information of U.S. Cellular from “HC” to “P”.

2.       Staff filed its Suggestions in Opposition to AT&T Missouri’s motion on September 26, 2006.

3.       U.S. Cellular agrees with Staff’s pleading with the exception of parts of paragraph 9. Staff contends that if AT&T Missouri has relied on the assumption that its employees would again be allowed to see U.S. Cellular’s building plans, the Staff would not oppose the inclusion in a procedural schedule of a reasonable time for AT&T Missouri to obtain an outside expert. U.S. Cellular believes this delay is not warranted.

4.       AT&T Missouri’s employees did not see U.S. Cellular’s coverage maps until the date of the hearing, when U.S. Cellular agreed, as an accommodation to AT&T, to declassify from “HC” to “P” three maps showing existing coverage and the proposed coverage for the 16 sites proposed at the time. Tr. 10/26/05 at pp. 6-7. AT&T prepared for the 2005 hearing without access to U.S. Cellular’s coverage maps and should another hearing be ordered by the Commission, AT&T should be able to do the same without access to Appendix 4 and 5. The coverage maps in Appendix 4 and 5 contain market specific information relating to services offered in competition with others.

5. As for the listing of proposed sites, the original list was publicly filed in U.S. Cellular's application. However, U.S. Cellular believes that the new site information, which was specifically prepared to meet the requirements set forth in the Commission's March 21 Order, needs to be protected from disclosure because it is both quantitatively and qualitatively different from the original plan. Appendix 1 contains market specific information relating to services offered in competition with others. In addition, Appendix 1 contains many sites that are not listed in U.S. Cellular's original application and covers a longer time period. The same is true for the wire center information in Appendix 2. While some of this information was filed publicly in U.S. Cellular's application, it is nonetheless market-specific information relating to services offered in competition with others that U.S. Cellular wishes to protect from disclosure to competitors.

6. AT&T has not challenged U.S. Cellular's assertion that the information contained in Appendices 1, 2, 4 and 5 is entitled to protection from disclosure to AT&T Missouri employees. Instead, AT&T argues that since its employees saw similar information before they are entitled to see the same type of information again. U.S. Cellular is entitled to change its position regarding the classification of information. U.S. Cellular did not waive its right to classify its competitive sensitive information, especially since much of the information was not contained in its original application.

7. U.S. Cellular filed its two-year plan on August 11, 2006. This means that AT&T has had almost two months to determine whether it should hire a consultant, as the other intervenors have done, to address the building plans. There is no need to delay this proceeding any more than it already has been by giving AT&T extra time obtain an outside expert. AT&T knew that , due to the terms of the protective order in this case, that HC building plans cannot be

seen by its employees. AT&T gambled that its employees would be allowed to see U.S. Cellular's HC information. U.S. Cellular's application should not be delayed by AT&T's gamble.

Respectfully submitted,

SONNENSCHN NATH & ROSENTHAL LLP

/s/ Karl Zobrist

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been mailed electronically to all counsel of record this 4th day of October, 2006.

/s/ Karl Zobrist

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