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September 21, 2005

Colleen Dale
Secretary
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

FILED³

SEP 23 2005

**Missouri Public
Service Commission**

Re: Mid-Missouri Telephone Company Complaint against T-Mobile, SBC, and
Motion to Consolidate with TC-2002-57..

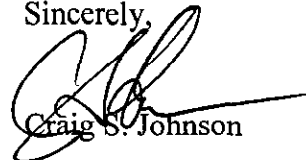
Dear Ms. Dale:

Please find enclosed for filing herein an original and three copies of a new Complaint, as well as a Motion to Consolidate this new complaint proceeding with TC-2002-57.

I have electronically provided copies to the counsel of record for the current parties in TC-2002-57, as well as OPC.

If any questions arise, please direct them to me.

Sincerely,



Craig S. Johnson

cc: Mark P. Johnson
Leo Bub
Mike Dandino
David Meyer

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED³

SEP 28 2005

Missouri Public
Service Commission

Mid-Missouri Telephone Company,)
)
Petitioner,)
)
v.)
)
Southwestern Bell Telephone Company,)
T-Mobile USA Inc.)
)
Respondents.)

Case No. _____

Complaint

Comes now Complainant Mid-Missouri Telephone Company, and for its Complaint against Respondent T-Mobile USA Inc. ("T-Mobile", formerly or also known as Voicestream Wireless, Aerial Communications Inc., and T-Mobile USA, which are collectively referred to herein as "T-Mobile") and against SBC Missouri d/b/a Southwestern Bell Telephone Company (SBC), made pursuant to § 386.390 RSMo and 4 CSR 240-2.070(3), and state as follows:

1. Complainant Mid-Missouri Telephone Company is a certificated local exchange company providing local exchange and exchange access telecommunications services in Missouri. The addresses and contact information for Complainant is as follows:

Denise Day, Co-CEO
Mid-Mo Tel Co.
P.O. box 38
215 Roe St.
Pilot Grove, MO 65276

Craig S. Johnson, Atty.
Mo Bar # 28179
1648-A East Elm St.
Jefferson City, MO 65101
(573) 632-1900

(573) 634-6018 (fax)

2. SBC is an IXC authorized to provide interexchange telecommunications services in Missouri, and as such interconnects with T-Mobile and with Complainant. SBC has terminated the traffic in question in its interexchange carrier capacity. SBC has refused to pay Complainant for such traffic.

3. T-Mobile is a commercial mobile radio service provider, or "wireless" or "cellular" carrier. It has originated the traffic in question, and delivered it to SBC for termination to Complainant. T-Mobile has refused to pay Complainant for such traffic.

4. SBC can be served with process by delivering this Complaint to:

Leo Bub, General Attorney
SBC Missouri
One SBC Center
Room 3518
St. Louis, MO 63101

5. T-Mobile can be served with process by delivering this Complaint to :

Dan Menser
Director - Legal Affairs
T-Mobile USA, Inc.
12920 SE 38th Street, Bellevue, WA 98006
425/378-4000 (office) ~ 425/920-2638 (fax)

and to:

Mark P. Johnson
Sonnenschein, Nath & Rosenthal
4520 Main St.
Suite 1100
Kansas City, MO 64111

6. According to cellular transiting usage summary reports and newer electronic billing records provided by SBC, between August 5, 2001 and January 13, 2005, SBC and T-

Mobile have delivered to Complainant 1,266,436 minutes of use of T-Mobile originated traffic. This traffic has been delivered in the absence of an approved agreement between T-Mobile and Complainant. This traffic has also been delivered in violation of SBC's wireless interconnection

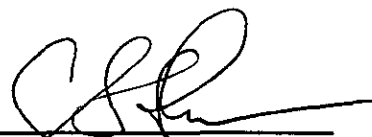
7. Complainant has made good faith collection efforts upon Respondents, Respondents have failed or refused to pay.

8. Complainant is entitled to be compensated for the use of its network in accordance with its access tariff, or its Wireless Termination Service Tariff, whichever was in effect at the time of traffic termination. Complainant is entitled to compensation from SBC, or alternatively from T-Mobile, depending upon the applicable tariff.

9. The Commission has jurisdiction over this matter by virtue of the authority found in §§ 386.390, 386.250, 386.020(52) and (53), and 392.240 RSMo.


Wherefore, Complainant requests that the Commission enter an Order satisfying this Complaint by issuing relief in one or more of the following respects:

- a. An Order directing Respondents SBC and/or T-Mobile to pay Complainant its applicable tariffed rate in effect when the traffic in question terminated.
- b. Such other relief as may be necessary in the premises.


/s/
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craig@csjohnsonlaw.com
Attorney for Complainants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was electronically mailed to the attorneys for T-Mobile, SBC, Staff, and OPC this 21st day of September, 2005.

/s/ 

Craig S. Johnson