

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the Petition for Arbitration of)	
Unresolved Issues in a § 251(b)(5))	Case No. TO-2006-0149
Agreement with Nextel Wireless)	

Joint Motion to Extend Arbitration Deadline

Come now Petitioners¹ and Respondent, Nextel Wireless ("Nextel") (collectively referred to as "Parties,"), by and through counsel and, pursuant to 4 CSR 240-2.080(16), hereby submit this Joint Motion to Extend Arbitration Deadline to the Missouri Public Service Commission ("Commission") and state in support thereof state as follows:

1. The instant case was initiated by a Petition for Arbitration filed with the Commission on October 4, 2005.
2. On October 17, 2005, an Initial Arbitration Meeting was conducted at which time representatives for Petitioners and Sprint PCS were present, along with the Arbitrator and the Advisory Staff.
3. At the Initial Arbitration Meeting, the Parties discussed a proposed procedural schedule that would be necessary in order for the Arbitrator to issue a Final Report by January 4, 2006 and for the Commission to issue a Final Decision, either approving or modifying the Arbitrator's Final Report, no later than January 24, 2006 (the "Arbitration Deadline").
4. The proposed schedule of proceedings discussed by the Parties and the Arbitrator would be highly condensed and demanding due to the limited time provided for by the Telecommunications Act of 1996 ("Act") and the Commission Rules at 4 CSR 240-36.040. In addition, given the press of other business, the intervening Thanksgiving and Christmas/New

¹BPS Telephone Company, Cass County Telephone Company, Ellington Telephone Company, Farber Telephone Company, Fidelity Telephone Company, Fidelity Communications Services I, Inc., Fidelity Communications Services II, Inc., Granby Telephone Company, Green Hills Telecommunications Services, Iamo Telephone Company, Kingdom Telephone Company, Lathrop Telephone Company, New Florence Telephone Company, and Steelville Telephone Exchange, Inc.

Years holidays, the available time would be further limited. Accordingly, the Parties believe that an extension of the January 24, 2006 Arbitration Deadline, with the consent of the Parties as expressed below, would enhance the negotiating process between and among the Parties, result in fewer contested issues remaining unresolved as a result of the negotiations, and facilitate the arbitration process both for the Parties and for the Commission.

5. Therefore, the Parties request that the Commission extend the January 24, 2006 Arbitration Deadline for Commission decision in these cases approximately sixty (60) days to March 24, 2006.

6. If the Commission extends the Arbitration Deadline as requested herein, each of the Parties hereby promises, covenants and agrees not to appeal the Commission's decision in this case on the basis that the Parties or the Commission failed to act within the time periods established by § 47 U.S.C. 252(b)(3) and (4)(C).

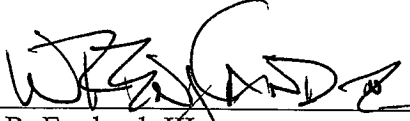
7. If the Commission extends the Arbitration Deadline as requested herein, the Parties propose to submit a proposed procedural schedule to the Arbitrator on or before November 10, 2005.

8. The voluntary extension of the Arbitration Deadline under the Act is a customary part of the practice and procedure of most, if not all, other state regulatory commissions of which the Parties are aware. In addition, it is consistent with this Commission's Order Authorizing the Arbitrator to Extend the Arbitration Schedule issued March 3, 2005 in Commission Case No. XO-2005-0277.

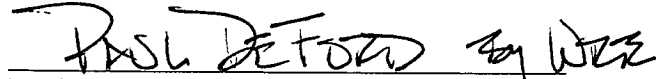
9. The granting of this Joint Motion will have no negative effect on any customers nor on the general public.

WHEREFORE, Petitioners and Respondent respectfully request that the Commission 1) extend the January 24, 2006 Arbitration Deadline for Commission decision in this case to March 24, 2006; 2) direct the Parties to file a new, proposed procedural schedule no later than November 10, 2005; and 3) issue such other orders as the Arbitrator and/or Commission deem just and necessary.

Respectfully submitted,



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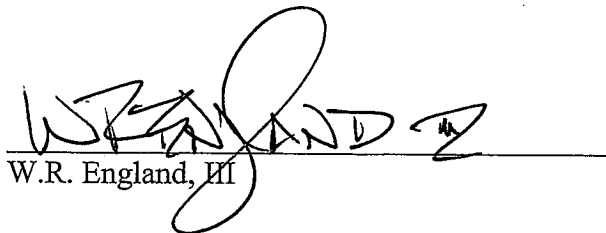
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or via electronic mail, or hand-delivered on this 28th day of October, 2005, to the following parties:

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