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Robert W. Hedrick 1918-1988

May 13, 2005



Secretary Missouri Public Service Commission 200 Madison Street Jefferson City, MO 65101

RE: Entry of Appearance

Case No.: TO-2005-0374

Dear Sir:

Please find attached for filing an original and eight copies of a MOTION FOR EXTENSION OF TIME TO FILE RESPONSE UNDER SECTION 252(B)(3) OF THE TELECOMMUNICATIONS ACT OF 1996 in the above reference case. A copy has been provided to all parties of record either by United States Mail or E-mail.

Sincerely,

Paul H. Gardner

PHG:jkb Attachment

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Petition of)	
Chariton Valley Telephone Corp.)	Case No. TO 2005 0374
for Arbitration of Unresolved Issues)	Case No. TO 2005 0374
Pertaining to a Section 251(b)(5))	
Agreement with United States Cellular)	MAY 1 3 2005
Corporation)	14W1 T 2 2003
		Missouri Public Service Commission

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE UNDER SECTION 252(b)(3) OF THE TELECOMMUNICATIONS ACT OF 1996

COMES NOW United States Cellular Corporation (hereinafter "USCC") by and through counsel and for its Motion for Extension of Time to File Response under Section 252(b)(3) of the Telecommunications Act of 1996 states as follows:

- 1. On April 20, 2005, Petitioners Chariton Valley Telephone Corporation, Northeast Missouri Rural Telephone Company, Mid-Missouri Telephone Company, Choctaw Telephone Company, Alma Telephone Company and MoKan Dial Inc. filed Petitions for Arbitration naming USCC as the Respondent pursuant to Section 252(b)(1) of the Telecommunication Act of 1996 (hereinafter "Act").
- On April 21, 2005, Petitioners filed a Motion to Consolidate these petitions and the Commission issued its Order Consolidating Cases on April 22, 2005 under Case No. TO-2005-0374. On May 5, 2005, the arbitrator issued an ORDER SETTING PROCEDURAL SCHEDULE under Case No. TO-2005-0374.

- 3. Section 252(b)(3) of the Act provides that "A non-petitioning party to a negotiation under this section may respond to the other party's petition and provide such additional information as it wishes within twenty-five days after the State Commission receives the petition."
- 4. USCC is the "non-petitioning party" under Section 252(b)(3) of the Act in this proceeding and its Response to the Petitions for Arbitration is currently due on May 16, 2005.
- 5. The parties to these proceedings have been engaged in extensive settlement negotiations for the purpose of resolving the issues raised by the Petitions for Arbitration and have made progress in resolving a number of the outstanding issues between Petitioners and Respondent. The parties continue to negotiate these issues as of the date of this Motion for Extension of Time and conducted face-to-face meetings in Jefferson City, Missouri on May 12, 2005.
- 6. As a result of the commitment of time and personnel to the negotiations designed to resolve the issues raised by the arbitration petition and the unavailability of key USCC personnel to complete work on the Response prior to May 16, 2005, Respondent would request an extension until Wednesday, May 18, 2005, to file its Response to the Petitions for Arbitration in Case No. TO-2005-0374.
- 7. Respondents do not propose any changes to the ORDER SETTING PROCEDURAL SCHEDULE issued on May 5, 2005, and Petitioners have communicated to Respondent that they

have no objection to the requested extension.

WHEREFORE, for good cause shown, Respondent USCC respectfully requests that the arbitrator grant USCC until Wednesday, May 18, 2005, to file its Response to the Petitions for Arbitration in Case No. TO-2005-0374.

Respectfully submitted,

Paul H. Gardner, Mo. Bar #28159

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Extension of Time to File Response under Section 252(b)(3) of the Telecommunications Act of 1996 has been hand-delivered, mailed, First Class mail, postage prepaid; or e-mailed this 13th day of May, 2005.

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Ronald D. Pridgin Administratve Law Judge Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102

Paul H. Gardner