

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

In the Matter of the Petition for Arbitration	)	
of Unresolved Issues in a Section 251(b)(5)	)	Case No. TO-2006-0147
Agreement with T-Mobile USA, Inc.	)	

In the Matter of the Petition for Arbitration	)	
of Unresolved Issues in a Section 251(b)(5)	)	Case No. TO-2006-0151
Agreement with Cingular Wireless.	)	

**PETITIONERS' MOTION FOR  
EXTENSION OF TIME TO SUBMIT REVISED COST STUDIES**

On the afternoon of Friday, March 3, the Arbitrator issued the Final Arbitration Report in this matter. The Final Arbitration Report directed Petitioners to change or modify a number of the inputs in Petitioners' first revised cost study required by the Preliminary Arbitration Report and to prepare a second revised cost study by 4:00 p.m. on Monday, March 6. The changes directed by the Final Arbitration Report are complex, and it will require substantial time to examine the HAI cost model to determine how the required changes will be achieved and to prepare individual cost studies for each Petitioner. Petitioners' expert is away from his office in previously scheduled meetings with other clients in other states through Wednesday, March 8. Thus, it is not possible to complete a second revised cost study by 4:00 today, and Petitioners respectfully request an extension of time to file revised cost studies until 4:00 p.m. on Friday, March 10.

RESPECTFULLY SUBMITTED,

/s/ Brian T. McCartney

W.R. England, III                      Mo.    #23975  
Brian T. McCartney                  Mo.    #47788  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue, P.O. Box 456  
Jefferson City, MO 65102-0456  
[trip@brydonlaw.com](mailto:trip@brydonlaw.com)  
[bmccartney@brydonlaw.com](mailto:bmccartney@brydonlaw.com)  
(573) 635-7166  
(573) 634-7431 (FAX)

Attorneys for Petitioners

### **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 6<sup>th</sup> day of March, 2006, to the following parties:

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

Michael F. Dandino  
Office of the Public Counsel  
P.O. Box 7800  
Jefferson City, Missouri 65102

Mark P. Johnson  
Roger Steiner  
Sonnenschein, Nath, and Rosenthal LLP  
4520 Main Street, Suite 1100  
Kansas City, MO 64111  
[mjohnson@sonnenschein.com](mailto:mjohnson@sonnenschein.com)  
[rsteiner@sonnenschein.com](mailto:rsteiner@sonnenschein.com)

John Paul Walters, Jr.  
15 E. 1<sup>st</sup> Street  
Edmond, OK 73034  
[pwalters@sbcglobal.net](mailto:pwalters@sbcglobal.net)

/s/ Brian T. McCartney