

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE 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**

**PUBLIC COUNSEL’S RESPONSE TO ORDER DIRECTING RESPONSE TO
COMPLIANCE FILING**

COMES NOW the Office of the Public Counsel (“Public Counsel”) and for its Response states as follows:

1. USCOC of Greater Missouri, LLC d/b/a U.S. Cellular has applied to the Commission for designation as an Eligible Telecommunications Carrier pursuant to the Telecommunications Act of 1996. On August 11, 2006, U.S. Cellular filed a Two-Year Network Improvement Plan, supported by the affidavit of Nick Wright.

2. On August 14, the Commission ordered each party to file, by September 1, a pleading “indicating whether it wishes to cross-examine U.S. Cellular’s witness about the compliance filing, whether it wishes to present additional evidence of its own, and whether it wishes to present additional argument.”

3. In response, Public Counsel states that it wishes to cross-examine U.S. Cellular’s witness about the compliance filing, that it wishes to present additional evidence of its own, and that it wishes to present additional argument.

WHEREFORE, Public Counsel respectfully requests that the Commission allow Public Counsel to conduct cross-examination of U.S. Cellular’s witness, to present additional evidence, and to present additional argument.

Respectfully submitted,

OFFICE OF THE Public Counsel

/s/ **Lewis R. Mills, Jr.**

By: _____

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to the following this 1st day of September 2006:

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