

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

In the Matter of Spectra Communications, Group,)	
LLC, d/b/a CenturyTel's Request for Competitive)	Case No. IO-2006-0108
Classification Pursuant to Section 392.245.5,)	
RSMo (2005).)	

**VERIFIED PLEADING OF T-MOBILE CONCERNING CUSTOMERS IN
SUBJECT EXCHANGES**

Comes now T-Mobile USA, Inc. ("T-Mobile), by its undersigned attorneys, and in response to the Commission's Order of September 22, 2005 ("Order") , states the following:

1. In Missouri, T-Mobile provides commercial mobile radio services through the following operating entities: VoiceStream PCS II Corporation, VoiceStream Kansas City, Inc., and Powertel/Memphis, Inc., doing business as T-Mobile – which, for the purposes of this pleading, shall be referred to collectively as T-Mobile. With respect to the Commission's Order, T-Mobile responds as follows:

2. T-Mobile objects on the basis that the Commission has no jurisdiction to regulate wireless carriers or the services they provide, or to join T-Mobile as a party to this proceeding. T-Mobile also does not concede that it is providing "basic local telecommunications service," as defined in Ch. 392.245.2, RSMo 2005, for the purposes of the competitive analysis the Commission must perform in this case.

3.. Without waiving and subject to the foregoing objections, T-Mobile responds as follows: T-Mobile does not have customers in the Ewing, LaBelle, Lewistown, Macon, and Savannah exchanges/rate centers.

Respectfully submitted,

/s/ Mark P. Johnson

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ATTORNEYS FOR T-MOBILE USA, INC.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served this 27th day of September, 2005, on all parties of record.

/s/Mark P. Johnson

Mark P. Johnson

VERIFICATION

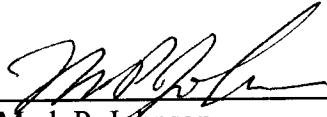
STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

Comes now Mark P. Johnson, being of lawful age and duly sworn, who swears and affirms as follows:

1. My name is Mark P. Johnson, and I am an attorney for T-Mobile USA, Inc. I have been authorized by T-Mobile to verify the foregoing on its behalf.


2. I have read the foregoing, and its contents are true and correct to the best of my knowledge and belief.

Further affiant sayeth not.



Mark P. Johnson

Subscribed and sworn to before me this 27 day of September, 2005.



Notary Public

My commission expires:

