

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

Verizon Wireless (VAW) LLC, Cellco  
Partnership, St. Joseph Celltelco, and  
CyberTel Cellular Telephone Company all  
d/b/a Verizon Wireless,

Complainants,

vs.

Southwestern Bell Telephone Company  
d/b/a AT&T Missouri

Respondent.

Case No. TC-2008-0150

**MOTION TO STAY PROCEEDINGS**

COME NOW Verizon Wireless (VAW) LLC, Cellco Partnership, St. Joseph Celltelco, and CyberTel Cellular Telephone Company all d/b/a Verizon Wireless (collectively "Verizon Wireless") and, pursuant to 4 CSR 240-2.080, hereby request that the Missouri Public Service Commission ("Commission") stay these proceedings for a period of 90 days. In support of its Motion, Verizon Wireless states as follows:

1. Verizon Wireless initiated this Complaint case after arriving at an impasse with Respondent in connection with the interpretation of certain terms and conditions of the merger of AT&T Inc. and BellSouth Corporation regarding the extension of existing interconnection agreements of AT&T Inc.

2. Subsequent to the filing of this Complaint, Respondent and Verizon Wireless reached an agreement regarding the extension of a Commission-approved interconnection agreement, and Respondent filed such amendment for approval with this Commission (*see* Case No. IK-2008-0222).

3. If the Commission approves the proposed amendment submitted for approval in Case No. IK-2008-0222, then the issues for which Verizon Wireless seeks relief pursuant to this Complaint will be moot.

4. Moreover, as stated in Respondent's Application For Approval of Amendment Extending Interconnection Agreement:

Once the Commission approves this proposed amendment and it becomes effective pursuant to its terms, Verizon Wireless will dismiss its Complaint against AT&T Missouri (Case No. TC-2008-0150) with prejudice.

(*Id.*, at p. 1).

5. By the end of the 90 period for which the stay is sought, the Commission will have either approved the proposed amendment filed in Case No. IK-2008-0222 (in which case, Verizon Wireless will dismiss this case) or rejected the proposed amendment (in which case, Verizon Wireless will pursue its rights and remedies under this case). But until the Commission takes action in Case No. IK-2008-0222, any additional activity in the instant proceedings would be an inefficient use of the parties' and the Commission's resources.

6. Counsel for Respondent does not object to the Commission staying these proceedings as described herein.

WHEREFORE, for the reasons stated herein, Verizon Wireless hereby requests that the Commission immediately stay all further action in connection with these proceedings (including, but not limited to, any requirement that Verizon Wireless file a response to Respondent's request for mediation, and the Staff report due January 25, 2008) for a period of 90 days from the date of its order, and for such other and further relief as the Commission deems just and proper in the circumstances.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ,  
L.C.

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## CERTIFICATE OF SERVICE

The undersigned hereby states that a true and complete copy of this Motion was sent via electronic transmission on the 10<sup>th</sup> day of January, 2008 to the following parties:

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*Thomas E. Pulliam*

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