



Cindy Manheim • Senior Counsel – Regulatory • phone 425.580.8112 • fax 425.580.8729

October 3, 2005

VIA ELECTRONIC MAIL (original via mail)

Honorable Cully Dale, Secretary and Chief Regulatory Law Judge
Honorable Morris Woodruff, Assigned Law Judge
Public Service Commission of the State of Missouri
Post Office Box 360
Jefferson City, Missouri 65102

Re: In re Spectra Communications Group d/b/a/ CenturyTel Sprint Missouri Inc.
(Case No. IO-2006-0108)
In re CenturyTel of Missouri, LLC (Case No. IO-2006-0109)

Honorable Cully Dale and Morris Woodruff:

Cingular Wireless on behalf of Missouri RSA 8 Limited Partnership; New Cingular Wireless PCS, LLC; Missouri RSA 11/12 Limited Partnership; Missouri RSA 9B1 Limited Partnership; and, MC Cellular, LLC, (collectively "Cingular"), hereby responds to the Order Granting Intervention, Resetting Hearing, and Adding Parties, and Directing Filing dated September 22, 2005 in Case No. IO-2006-0108 and the Order Adding Parties and Directing Response in Case No. IO-2006-0109 (collectively the "Orders").

Cingular, an FCC-licensed commercial mobile radio service (CMRS) provider, respectfully objects to the Orders on the basis that CMRS providers are not "public utilities" under Chapter 386 of the Missouri Revised Statutes. See MRS § 386.020. Consequently, the Public Service Commission ("Commission") is respectfully without jurisdiction to require CMRS providers such as Cingular to be made a party to these proceedings or to respond to the Orders.

Without waiving the foregoing objection, Cingular respectfully responds to the Order as follows:

1. Cingular does not distinguish between residential and non-residential customers in its account records.
2. The Commission may obtain information relevant to the Cingular's subscriber counts per rate center in Missouri through the company's Numbering Resource Utilization/Forecast Report, FCC Form 502 ("NRUF Reports") submitted to the North American Numbering Plan Administrator (NANPA) twice yearly. Among other things, every telecommunications carrier having number resources (landline and wireless) must submit in the NRUF reports the total number of telephone numbers that the carrier is currently utilizing or forecasts it will utilize in each rate center. The assigned numbers include those numbers that have been assigned to end users and those numbers that have been ported out from the carrier to other carriers.

Each carrier is required to report this information by NPA-NXX, and consequently, this information would provide information relevant to the geographic area(s) served by the carrier.

While the data in Cingular's NRUF Reports constitutes proprietary and confidential trade secret information, the Commission may review carrier-specific NRUF Reports with respect to Missouri NPAs, provided that the Commission has appropriate confidentiality protections in place to preclude disclosure of the carrier's NRUF report to any entity other than NANPA or the FCC. See 47 C.F.R. § 52.15(f)(7).

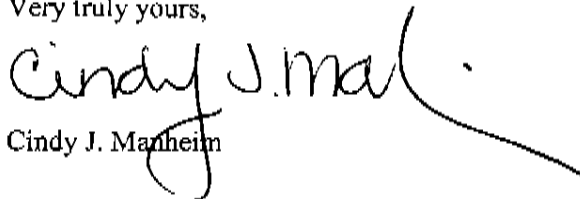
3. For general information about the number of subscribers in the state, the Commission may refer to the broadband data collected and reported by the FCC in its Local Telephone Competition Report (the "Local Competition Report"). The most recent Local Competition Report, published earlier this month, is available at <http://www.fcc.gov/wcb/latd/comp.html>. This report sets forth aggregated data collected by the FCC through its FCC Form 477, the Local Competition and Broadband Reporting form. Through the Form 477, facilities-based service providers report data twice a year on the deployment of broadband, local telephone, and mobile telephony services.

Although Cingular has requested of the FCC not to disclose its provider-specific data contained in the Form 477, the Commission may obtain access to Cingular's Missouri information from the FCC, provided that the Commission has protections in place to preclude disclosure of Cingular's confidential information. See 47 C.F.R. § 43.11(c).

4. Knowing the Commission's expedited deadlines in this docket and because of the timing of this letter, Cingular in this instance attaches Appendix A, verified in Appendix B, to provide qualified responses for each of the identified exchanges.

Should there be any further questions in this matter, please contact Cindy Manheim at 425.580.8112.

Very truly yours,



Cindy J. Manheim

cc: Mark Ashby, Chief Counsel, Cingular Wireless
Paul Lane

Appendix A

Cingular Wireless:

Exchange	Two Customers
Dardenne	X
O'Fallon	X
Wentzville	X
St. Peters	X
Bourbon	X
Columbia	X
Cuba	X
St. James	X
LaBelle	X
Lewistown	X
Macon	X
Savannah	X

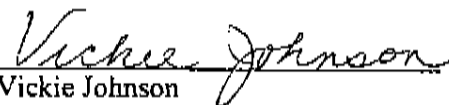
* These affirmative responses merely confirm the existence of at least two customers with billing addresses in the areas that Cingular has internally coded as being near the listed city, which may or may not correspond exactly with the exchanges listed.

Public Service Commission of the State of Missouri
October 3, 2005
Page 4


Appendix B

VERIFICATION

I, Vickie Johnson, of lawful age on my oath state that I am a Senior Tax Manager for Cingular Wireless; that I have participated in the preparation of the attached chart, prepared in response to the Commission's Orders; that I have knowledge of the information set forth in the chart labeled "Appendix A"; and, that the information is true and correct to the best of my knowledge and belief.


Vickie Johnson

Subscribed and sworn to before me this 3 day of October, 2005.


Notary Public

My Commission Expires:

PAULA A. ALARCON
Notary Public State of Georgia
DeKalb County

My Commission Expires December 13, 2006

