

**BEFORE THE PUBLIC SERVICE COMMISSION
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**

**U.S. CELLULAR’S MOTION FOR
LEAVE TO FILE RESPONSE OUT OF TIME**

1. On August 11, 2006, U.S. Cellular filed its two-year network improvement plan, in response to a March 21, 2006 Commission Order (“March 21 Order”) directing U.S. Cellular to submit additional evidence regarding how it intends to use federal high-cost universal service support once designated by the Commission.

2. On August 14, 2006, the Commission directed each of the other parties to file a pleading indicating whether they wish to cross-examine U.S. Cellular’s witness about the compliance filing, whether they wish to present additional evidence of their own, and whether they wish to present additional argument.

3. All of the other parties to this docket filed pleadings on or before September 1, 2006.

4. On September 5, the Commission established a September 21, 2006 prehearing conference, which was moved to September 22 at the request of U.S. Cellular.

5. Under Commission Rule 240-2.080(15) parties shall not be allowed more than 10 days from date of filing in which to respond to any pleading unless ordered by the Commission.

6. As the Commission ordered the prehearing before U.S. Cellular had a chance to respond to the parties’ September 1st pleadings, U.S. Cellular requests this opportunity to file a written response. That written response entitled “U.S. Cellular’s Response to Requests for Additional Proceedings” was filed on the same day as this motion.

7. The substance of the Response will no doubt be discussed at the September 22 prehearing as well as in further pleadings by the parties. Therefore, there is no prejudice to the parties by permitting the response to be filed.

WHEREFORE, for the above reasons, U.S. Cellular requests that it be granted leave to file its Response to Requests for Additional proceedings.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been mailed electronically to all counsel of record this 21st day of September, 2006.

/s/ Karl Zobrist
ATTORNEYS FOR USCOC OF
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