

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

In the Matter of the Application of )  
Northwest Missouri Cellular Limited )  
Partnership for Designation as a )  
Telecommunications Company Carrier )  
Eligible for Federal Universal Service )  
Support Pursuant to Section 254 of the )  
Telecommunications Act of 1996 )

Case No. TO-2005-0466

**PROPOSED ISSUES LIST, WITNESS LIST, ORDER OF CROSS-EXAMINATION,  
AND ORDER OF OPENING STATEMENTS**

COMES NOW the Staff of the Missouri Public Service Commission and states:

1. On April 13, 2006, the Commission issued its Order Granting Motion To Modify Procedural Schedule which directs the parties to file an issues list, witness list, order of cross-examination, and order of opening statements by May 22, 2006.

2. The Staff, the Office of the Public Counsel (OPC), Northwest Missouri Cellular Limited Partnership (NWMC), Holway Telephone Company, Spectra Communications Group, LLC d/b/a CenturyTel and CenturyTel of Missouri, LLC (collectively, CenturyTel) and Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri (AT&T Missouri) agree upon the following issues:

Issues

**Issue 1.** Telecommunications companies seeking eligible telecommunications carrier (“ETC”) status must meet the requirements of Section 214(e)(1) throughout the service area for which designation is received. Section 214(e)(1) requires a carrier to offer the services that are supported by Federal universal service support mechanisms either using its own facilities or a combination of its own facilities and resale of another carrier’s services (including the services offered by another eligible telecommunications carrier);

and to advertise the availability of such services and the charges therefore using media of general distribution. Does NWMC meet the requirements of Section 214(e)(1) throughout the service area for which it seeks designation?

**Issue 2.** ETC designations by a state commission must be consistent with the public interest, convenience and necessity pursuant to Section 214(e)(2). The Federal Communication Commission’s (“FCC’s”) *ETC Designation Order* determined that this public interest standard applies regardless of whether the area is served by a rural or non-rural carrier. Is granting ETC status to NWMC consistent with the public interest, convenience and necessity throughout the service area for which NWMC seeks ETC designation?

**Issue 3.** In addition to the standards set out in the FCC’s *ETC Designation Order*, the Commission has promulgated rules to be used in evaluating ETC applications. A final Order of Rulemaking for these rules, designated as 4 CSR 240-3.570, was published in the Missouri Register on May 15, 2006. Does NWMC meet the requirements of the Commission’s ETC rules?

3. All parties agree on the following order of witnesses and order of cross-examination:

Witness

Order of Cross-Examination

Roger Bundridge (NWMC)

OPC, Staff, CenturyTel, Holway, AT&T Missouri

Jonathan Reeves (NWMC)

OPC, Staff, CenturyTel, Holway, AT&T Missouri

Kathryn Zentgraf (NWMC)

OPC, Staff, CenturyTel, Holway, AT&T Missouri

Barbara Meisenheimer (OPC)	Staff, CenturyTel, Holway, AT&T Missouri, NWMC
Adam McKinnie (Staff)	OPC, CenturyTel, Holway, AT&T Missouri, NWMC
Glenn Brown (CenturyTel)	Holway, AT&T Missouri, Staff, OPC, NWMC
William Warriner (Holway)	CenturyTel, AT&T Missouri, Staff, OPC, NWMC
James Stidham (AT&T Missouri)	CenturyTel, Holway, Staff, OPC, NWMC

4. All parties agree on the following order of opening statements: NWMC, OPC, Staff, CenturyTel, Holway and AT&T Missouri.

WHEREFORE, the Staff proposes the above lists on behalf of itself and all other parties.

Respectfully submitted,

/s/ William K. Haas

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Deputy General Counsel  
Missouri Bar No. 28701

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## **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 22<sup>nd</sup> day of May 2006.

**/s/ William K. Haas**  
**William K. Haas**