

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

In the Matter of the Request of Southwestern Bell)
Telephone, L.P., d/b/a SBC Missouri, for a Waiver) Case No. TE-2006-0053
of Certain Requirements of 4 CSR 240-29.040(4).)

MOTION FOR LEAVE TO FILE OUT OF TIME

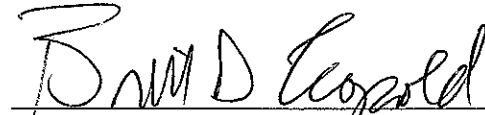
COMES NOW Sprint Missouri, Inc, (hereinafter referred to as "Sprint") and hereby files its Motion For Leave To File Out of Time regarding the Commission's Order Adding Parties and Directing Filing ("Order") in the above referenced case. In support of this motion, Sprint states the following:

1. On September 12, 2005, the Commission issued its Order Adding Parties and Directing Filing making Sprint and CenturyTel Missouri parties to this SBC case. The Commission also directed Sprint and CenturyTel to file a response explaining why or why not they are affected by the subject rule.
2. Sprint prepared its response to the Commission's Order prior to the September 22, 2005 deadline with full intention of filing the response in a timely manner; however, Sprint inadvertently failed to file its Motion on the requested date. Sprint was made aware of this oversight during the recent industry workshops.
3. No party was disadvantaged by Sprint's error. Sprint distributed a response informally to the Missouri Commission Staff for its review prior to the deadline (See "Attachment A"). Furthermore, Sprint has actively participated in the various Commission workshops on this matter and has fully explained that it will not be seeking a commission waiver for this rule.

WHEREFORE Sprint respectfully requests that Sprint's response to the Commission's Order be accepted out of time.

Respectfully submitted,

SPRINT

A handwritten signature in black ink, reading "Brett D. Leopold". The signature is written in a cursive style with a large, stylized "B" and "L".

Brett D. Leopold, MO Bar 45289
6450 Sprint Parkway
KSOPHN0212-2A353
Overland, Park, KS 66251
Voice: 913-315-9155
Fax: 913-523-9630
Email: brett.d.leopold@sprint.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 22nd day of November, 2005, a copy of the above and foregoing was served via electronic mail to each of the following parties:

Dana K. Joyce
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
gencounsel@mo.psc.gov

Keith R. Krueger
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102
keith.krueger@psc.mo.gov

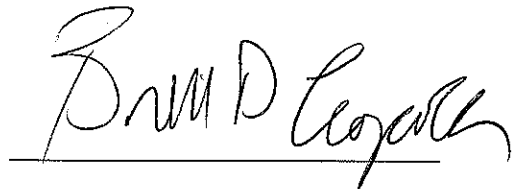
Office of Public Counsel
200 Madison Street
P. O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

W. R. England III
Brian T. McCartney
Brydon, Swearngen & England P.C.
312 Capitol Avenue
P.O.Box 456
Jefferson City, MO 65102-0456
trip@brydonlaw.com
tadams@brydonlaw.com

Craig S. Johnson
Andereck, Evans, Milne, Peace
& Johnson L.L.C
The Col. Darwin Marmaduke House
700 East Capitol Avenue
P. O. Box 1438
Jefferson City, Missouri 65102
cjohnson@aempb.com

Paul G. Lane
SBC Missouri
One Bell Center, Room 2518
St. Louis, MO 63101
Paul.lane@sbc.com

Becky Powell
CenturyTel of Missouri L.L.C
220 Madison Street
Jefferson City, Missouri 65101
becky.powell@centurytel.com



A handwritten signature in black ink, appearing to read "Brian T. McCartney", is written over a horizontal line.

ATTACHMENT A

Subject: Meeting to discuss ERE waiver

-----Original Message-----

From: Idoux, John R [REG]

Sent: Monday, September 12, 2005 1:49 PM

To: 'william.voight@psc.mo.gov'

Subject: RE: Meeting to discuss ERE waiver

Bill --

I have a last minute personal issue which I must address on Tuesday and will not be able to attend the meeting. If possible, I would like to call in and can provide a call-in number or simply dial the conference room.

Here is where Sprint is with the ERE rule:

For wireless calls, Sprint also replaces the actual calling party number with a BTN (Billing Telephone Number) to properly identify the wireless carrier as Cingular, Verizon, SprintPCS, etc. Without the change from the actual calling number to the BTN, the terminating carrier using the records would not be able to determine the responsible wireless provider unless a LNP look-up is performed, which adds to the overall cost of the terminating carrier.

Sprint's fiscal impact included the cost to make the necessary changes. Sprint is currently in the very preliminary steps of making the system modifications to leave the calling number unchanged; however, if implemented, this will cause substantial system changes by all the terminating carriers who use Sprint's records. Sprint has not received any request to change from its current process of switching the actual calling party number with the BTN and feels it is therefore in compliance with the rule since there is an "out" if carriers mutually agree otherwise. This is the reason Sprint has not sought a similar waiver request as SBC.

Finally, many of Sprint's exchanges sit behind SBC's McGee tandem which means Sprint is also a terminating carrier that uses SBC's records. In fact, based upon the size of the exchanges I anticipate that Sprint's use of SBC's records far outweigh most if not all the small carriers. If SBC does not receive approval on its waiver request and is required to make the system modifications, Sprint would be required to change its own internal systems to process the SBC records and to also perform a LNP lookup for each and every records. The small carriers would also have to make substantial system changes and perform a LNP lookup.

Sprint still has several small carriers which sub-tend its tandems using paper reports because they do not want to incur the system changes to process the CAT-11 records which have been available for several years.

John R. Idoux

Sprint - Senior Manager, Regulatory Affairs

(913) 315 8564

john.r.idoux@mail.sprint.com

-----Original Message-----

From: william.voight@psc.mo.gov [mailto:william.voight@psc.mo.gov]

Sent: Friday, August 26, 2005 11:47 AM

To: trip@brydonlaw.com; Idoux, John R [CC]; arthur.martinez@centurytel.com; cjohnson@aempb.com

Cc: john.vaneschen@psc.mo.gov; keith.krueger@psc.mo.gov; arthur.kuss@psc.mo.gov

Subject: Meeting to discuss ERE waiver

I have reserved Room 510 here at the Commission on September 13th for a meeting to discuss SBC's waiver request of the AMA wireless originated call issue. I have the room reserved from 9:30 to 3:00,

although there probably is no reason to meet that long. Bell will be bringing outside people to discuss. I hope we can have a productive meeting to find out just where we are on this issue. Please let me know if you are interested in coming and if this date and time works or does not work for you. Thank you and best regards;

William (Bill) Voight
Assistant Manager, Rates and Tariffs
Telecommunications Department
573-751-4227