

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

|   |   |                       |
|---|---|-----------------------|
| In the Matter of the Petition for Arbitration | ) |                       |
| of Unresolved Issues in a Section 251(b)(5)   | ) | Case No. TO-2006-0463 |
| Agreement with ALLTEL Wireless                | ) |                       |
| and Western Wireless                          | ) |                       |

**JOINT LIST OF ISSUES,  
PROPOSED PROCEDURAL SCHEDULE,  
AND MOTION TO EXTEND ARBITRATION DEADLINE**

COME NOW the petitioning small incumbent local exchange companies ("Petitioners") and Alltel Communications, Inc. and WWC License L.L.C. ("ALLTEL" or "Respondents"), and for their Joint List of Issues, Proposed Procedural Schedule, and Motion to Extend Arbitration Deadline, respectfully state to the Missouri Public Service Commission ("Commission") as follows:

**I. JOINT ISSUES LIST**

Pursuant to the Commission's June 22, 2006 Order Directing Filing, the parties submit the following list of issues remaining to be resolved:

1. Reciprocal Compensation Mechanism -  
Bill & Keep or Forward-Looking Cost Rates (*Issue A*)
2. Provisions for Direct Interconnection (*Issue D*)
3. Reciprocal Compensation Obligations for IXC Traffic (*Issue E*)

These issues are discussed in the Petition for Arbitration (III. A – page 5 and Attachment E; III.D and III.E – page 6 and 7) and ALLTEL's Response (II.A – pages 2, 3 and 4; II.D – page 5. and II.E – page 7).

## **II. PROPOSED PROCEDURAL SCHEDULE**

The Parties jointly propose the following procedural schedule and request that the Commission extend the arbitration decision deadline until November 17, 2006 to accommodate this proposed procedural schedule:

|   |                       |
|---|-----------------------|
| Simultaneous Direct Testimony (35 days)   | August 11, 2006       |
| Simultaneous Rebuttal Testimony (20 days) | August 31, 2006       |
| Final Issue List (8 days)                 | September 8, 2006     |
| Arbitration Hearing                       | September 20-21, 2006 |

*Extension of Arbitration Decision Deadline to November 17, 2006*

## **III. MOTION TO EXTEND ARBITRATION DECISION DEADLINE**

As noted above, the parties hereby jointly move that the Commission extend the arbitration decision deadline in this matter until November 17, 2006. Such extension would be consistent with extensions granted by the Commission in other, similar Interconnection Agreement Arbitrations under Section 251 (b) (5). See, Case No. XO-2005-0277 (CD Telecommunications Arbitration with CenturyTel and Spectra), "Order Authorizing the Arbitrator to Extend the Arbitration Schedule" (issued March 3, 2005), and subsequent Orders in that case; and Case No. TO-2006-0147 (Rural ILECs' Arbitration with T-Mobile USA), "Order Extending Arbitration Deadline" (issued October 31, 2005).

WHEREFORE, the Parties respectfully request that the Commission adopt their proposed procedural schedule and extend the arbitration deadline.

RESPECTFULLY SUBMITTED,

/s/ Brian T. McCartney

W.R. England, III Mo. #23975  
Brian T. McCartney Mo. #47788  
BRYDON, SWEARENGEN & ENGLAND P.C.  
312 East Capitol Avenue, P.O. Box 456  
Jefferson City, MO 65102-0456  
[trip@brydonlaw.com](mailto:trip@brydonlaw.com)  
[bmccartney@brydonlaw.com](mailto:bmccartney@brydonlaw.com)

Attorneys for Petitioners

/s/ William D. Steinmeier

William D. Steinmeier Mo. #25689  
Mary Ann (Garr) Young Mo. #27951  
William D. Steinmeier P.C.  
2031 Tower Drive  
Jefferson City, MO 65109  
[wds@wdspsc.com](mailto:wds@wdspsc.com)  
[myoung0654@aol.com](mailto:myoung0654@aol.com)

Attorneys for Respondents

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, and/or via electronic mail, or hand-delivered on this 7<sup>th</sup> day of July, 2006, to the following parties:

Ron Williams  
VP – Interconnection/Compliance  
ALLTEL  
3650 131<sup>st</sup> Ave SE #400  
Bellevue, WA 98006  
[ron.williams@alltel.com](mailto:ron.williams@alltel.com)

/s/ Brian T. McCartney

Brian T. McCartney