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APR 18 2003

**Missouri Public
Service Commission**

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

In the Matter of the Tariff Filing of)	
Spectra Communications Group LLC to)	Case No.
Introduce the provisioning of IntraMTA)	Tariff No. JI-2003-1728
Wireless Service)	

MOTION TO REJECT TARIFF OR IN THE ALTERNATIVE TO SUSPEND

COMES NOW Sprint Spectrum L.P. d/b/a Sprint PCS ("Sprint") and respectfully requests that the Commission pursuant to Section 392.220.4 RSMo reject or in the alternative suspend the tariff filing made by Spectra Communications Group LLC. In Support of this motion, Sprint states as follows:

1. On March 24, 2003, Spectra Communications Group LLC ("Spectra") filed an original Wireless Service Termination Tariff. The effective date for the tariff is April 25, 2003. The tariff covers charges for the termination of wireless calls in Spectra's service area. The tariff is similar in many respects to tariffs approved by the Commission in TT-2001-139. Sprint objected to the approval of those tariffs arguing that the tariffs did not comply with applicable federal law. Sprint is currently involved in the appeal of the approval of those tariffs.

2. While Sprint continues to maintain its objection to the approval of any Wireless Service Termination tariffs, the tariff filed by Spectra contains a provision that to Sprint's knowledge has not been previously approved by this Commission and which is particularly troubling to Sprint. Specifically, Section F of the proposed tariff reads as follows:

Land to Mobile

Land to Mobile local traffic that originates on Telephone Company's network and terminates on CMRS' network transiting a third party tandem will be charged to the CMRS provider at the same rates that the third-party provider charges CenturyTel.

This language violates the FCC rules and imposes unfair and unequal requirements on wireless providers that are not assumed by CenturyTel under similar circumstances.

3. FCC Rule 51.702(b) states as follows:

A LEC may not assess charges on any other telecommunications carrier for the local telecommunications traffic that originates on the LEC's network. 47 C.F.R. 51.703(b)

As Provision F of CenturyTel's proposed tariff applies to local traffic both within an exchange and within an MTA, it is in direct violation of this rule.

4. Further, Section F of the proposed tariff may violate Section 392.200.3 RSMo that prohibits CenturyTel from creating an undue advantage for itself in connection with the delivery of telecommunications service. In this case, CenturyTel seeks to require the wireless provider to pay for a portion of a local call that it does not pay itself when similarly situated

5. Therefore, the Commission should reject CenturyTel's tariff. In the alternative, the Commission should suspend CenturyTel's tariff and open up a proceeding to investigate its compliance with applicable federal and state rules.

WHEREFORE, Sprint respectfully requests that the Commission reject or in the alternative suspend the tariff filed by CenturyTel.

Respectfully submitted,

SPRINT



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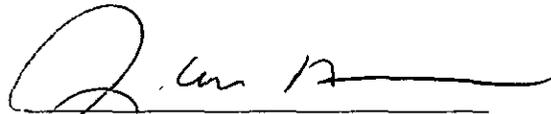
CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the above and foregoing was served on each of the following parties by first-class/electronic/facsimile mail, this 17th day of April, 2003.

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