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April 23, 2002

VIA UPS OVERNIGHT DELIVERY

Secretary of the Commission
Missouri Public Service Commission
Data Center – 1st Floor
200 Madison Street
Jefferson City, Missouri 65102

RE: Case No. TC-2002-57, et al. (Consolidated)

Dear Mr. Roberts:

Enclosed please find an original and eight (8) copies of a Motion for Reconsideration of Notice of Dismissal filed by Celco Partnership and Cybertel Cellular Telephone Company in the above-referenced proceeding. Please file this Motion in your usual manner and return the extra enclosed copy with the date of filing stamped thereon directly to the undersigned in the enclosed, self-addressed stamped envelope at your first opportunity.

If you have any questions with respect to this filing, please contact me. Thank you for your attention to and assistance with this matter.

Very truly yours,

Thomas E. Pulliam

Thomas E. Pulliam

TEP\wh
Enclosures

cc: Charon Harris, Esq. (w/enclosure)
Counsel of Record (w/enclosure)

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

Northeast Missouri Rural Telephone Company
and Modern Telecommunications Company,
Petitioners,

vs.

Southwestern Bell Telephone Company,
Southwestern Bell Wireless (Cingular),
Voicestream Wireless (Western Wireless)
Aerial Communications, Inc., CMT Partners
(Verizon Wireless), Sprint Spectrum LP,
United States Cellular, Ameritech Mobile
Communications, Inc.,
Respondents.

Case No. TC-2002-57
(Consolidated)

**MOTION FOR RECONSIDERATION
OF NOTICE OF DISMISSAL**

COME NOW Cellco Partnership and Cybertel Cellular Telephone Company and, pursuant to 4 CSR 240-2.160(2) file this motion seeking reconsideration of a portion of the Commission's Notice of Dismissal of Certain Claims Against Certain Respondents dated April 16, 2002. In support of its Motion, Cellco Partnership and Cybertel Cellular Telephone Company hereby state as follows:

1. On April 9, 2002, Petitioner Kingdom Telephone Company filed a notice of dismissal with respect to, among others, Ameritech Mobile Communications, Inc., and Cellco Partnership and Cybertel Cellular Telephone Company doing business as Verizon Wireless, pursuant to 4 CSR 240-2.116(1).

2. Since said dismissal occurred "before prepared testimony [had] been filed or oral evidence [had] been offered," (4 CSR 240-2.116(1)) Kingdom Telephone Company had the right to dismiss such parties without leave of the Commission and without consent of the adverse parties.

3. The Commission's Notice dated April 16, 2002 states that "with the possible exception of ALLTEL Missouri, Inc., each of these Respondents remains subject to other claims asserted by other Petitioners in this consolidated case."

4. None of the other complaints in this consolidated docket have named Cellco Partnership or Cybertel Cellular Telephone Company as a respondent.

5. Because neither of these entities have been named as a respondent in these proceedings, the Notice of Dismissal filed by Petitioner Kingdom Telephone Company should act as a dismissal of these entities from consolidated Case No. TC-2002-57.

WHEREFORE, Cellco Partnership and Cybertel Cellular Telephone Company hereby request the Commission to reconsider its Notice dated April 16, 2002 by acknowledging that Cellco Partnership and Cybertel Cellular Telephone Company are dismissed as respondents in these proceedings and from further participation in Case No. TC-2002-57.

Respectfully submitted,

OTTSEN, MAUZÉ, LEGGAT & BELZ, L.C.

By: Thomas E. Pulliam

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|--------------------------------|--------|
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Attorneys for Respondents Cellco Partnership
And Cybertel Cellular Telephone Company
d/b/a Verizon Wireless

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was mailed, first class mail, postage pre-paid, the 23rd day of April, 2002, to:

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