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April 15, 2002

VIA FEDERAL EXPRESS

Mr. Dale Roberts
Executive Secretary
Missouri Public Service Commission
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

RE: Case No TC-2002-57

Dear Mr. Roberts:

Enclosed for filing with the Commission are the original and nine copies of the following: (1) Response of Western Wireless Corporation to Motion for Default Judgment; (2) Motion to File Answer Out of Time; and (3) Answer of Western Wireless Corporation to Amended Complaint in the referenced case number. Please return one "filed" stamped copy of each pleading to me in the enclosed return envelope.

Thank you for bringing this matter to the attention of the Commission. If you should have any questions, please do not hesitate to contact me.

Very truly yours,

Mark P. Johnson

MPJ/rgr
Enclosures
cc : All Parties of Record (w/enclosures)

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Northeast Missouri Rural Telephone Company, et al.,	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. TC-2002-57
	)	
	)	
Southwestern Bell Telephone Company, et al.,	)	
	)	
Respondents.	)	

RESPONSE OF WESTERN WIRELESS CORPORATION
TO MOTION FOR DEFAULT JUDGMENT

Comes now Western Wireless Corporation ("Western Wireless"), by its undersigned counsel, and in response to the Motion for Default Judgment filed by Kingdom Telephone Company ("Kingdom"), states the following:

1. Kingdom is the complaining party in Case No. TC-2002-214, which has been consolidated with several other complaint cases into the captioned proceeding.

2. Kingdom included Western Wireless as a Respondent in its original Complaint, filed in 2001. Apparently Kingdom filed an Amended Complaint on January 16, 2002, as stated in Kingdom's motion. After searching his files, Western Wireless' counsel cannot find a copy of the Amended Complaint, and cannot establish whether he ever received a copy.

3. Western Wireless has filed answers to several Complaints in this consolidated proceeding, including several in February, 2002, at or about the time the answer to Kingdom's Amended Complaint would have been due. Thus, Western Wireless has been an active participant in this proceeding and by all indications either overlooked or was unaware of Kingdom's Amended Complaint.

4. Counsel for Kingdom has provided to counsel for Western Wireless a copy of the Amended Complaint, and Western Wireless has prepared an answer, which is attached to Western Wireless' motion to file its answer out of time. As far as Western Wireless knows, no party will be prejudiced by allowing Western Wireless to file its answer at this time.

Wherefore, Western Wireless respectfully requests that the Commission deny Kingdom Telephone Company's motion for default judgment.

Respectfully submitted,

SONNENSCHEIN NATH & ROSENTHAL

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ATTORNEYS FOR WESTERN WIRELESS CORPORATION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by first class United States mail, postage prepaid, on all parties of record on this 15th day of April, 2002.

Counsel for Western Wireless Corporation

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Northeast Missouri Rural Telephone Company, et al.,	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. TC-2002-57
	)	
	)	
Southwestern Bell Telephone Company, et al.,	)	
	)	
Respondents.	)	

MOTION TO FILE ANSWER OUT OF TIME

Comes now Western Wireless Corporation ("Western Wireless"), by its undersigned counsel, and moves pursuant to 4 CSR 240-2.070(9), for permission to file its answer to the amended Complaint in Case No. TC-2002-214 out of time. In support of this motion, Western Wireless states the following:

1. Kingdom Telephone Company initiated Case No. TC-2002-214 by filing a Complaint on or about October 30, 2001. Western Wireless is one of several Respondents in that case. Each Respondent is a wireless carrier in Missouri.

2. Western Wireless filed its Entry of Appearance and Request for Voluntary Mediation in Case No. TC-2002-214 on December 7, 2001.

3. Counsel for Western Wireless appeared at and participated in the January 10, 2002, prehearing conference in what became the consolidated Complaint cases. Western Wireless has filed answers in several Complaint cases which are now part of this consolidated proceeding, including answers in Case Nos. TC-2001-113, 167, and 182. The undersigned also represents VoiceStream Wireless and Aerial Communications in several of the Complaint cases, and there is some overlap with the

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Counsel for Western Wireless Corporation

3BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

Northeast Missouri Rural Telephone Company, et al.,	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. TC-2002-57
	)	
	)	
Southwestern Bell Telephone Company, et al.,	)	
	)	
Respondents.	)	

ANSWER OF WESTERN WIRELSS TO AMENDED COMPLAINT

Comes now Western Wireless Corporation ("Western Wireless"), and for its answer to the Amended Complaint brought by Kingdom Telephone Company in Case No. TC-2002-214, states the following:

1. Western Wireless is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraphs 1 and 2 of the Amended Complaint, and therefore denies same.

2. Western Wireless is not obligated to admit or deny the allegations contained in Paragraphs 3 through 6 of the Amended Complaint.

3. Western Wireless admits the allegations in Paragraph 7 of the Amended Complaint.

4. Western Wireless is not obligated to admit or deny the allegations contained in Paragraphs 8 through 10 of the Amended Complaint.

5. Western Wireless admits the allegations in the first sentence of Paragraph 11, as they relate to Western Wireless, the allegations in the second sentence that

CERTIFICATE OF SERVICE

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Counsel for Western Wireless Corporation