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April 13, 2004

EUGENE E. ANDERECK (1923-2004)
GREGORY C. STOCKARD (1904-1993)
PHIL HAUCK (1924-1991)

FILED

APR 13 2004

Secretary
Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

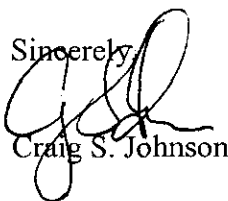
**Missouri Public
Service Commission**

Re: Motion to Suspend Procedural Schedule with Respect Only to the Complaints
Against Respondent Sprint PCS/Sprint Spectrum
Case No. TC-2002-57

Dear Secretary:

Enclosed for filing please find the original and eight copies of the Motion to Suspend
Procedural Schedule with Respect Only to the Complaints Against Respondent Sprint
PCS/Sprint Spectrum in the above referenced case.

Thank you for seeing this filed. If you should have any questions or concerns, please do
not hesitate to contact me.

Sincerely,

Craig S. Johnson

CSJ:lw

Encl.

CC: Public Service Commission
Office of Public Counsel
All parties of record

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED

APR 13 2004

Northeast Missouri Rural Telephone Company)
And Modern Telecommunications Company,)

Petitioners,)

v.)

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 Corp., and Ameritech)
Mobile Communications, Inc.,)

Respondents.)

Missouri Public
Service Commission

Case No. TC-2002-57, et al
consolidated.

**MOTION TO SUSPEND PROCEDURAL SCHEDULE
WITH RESPECT ONLY TO THE COMPLAINTS AGAINST
RESPONDENT SPRINT PCS/SPRINT SPECTRUM**

COME NOW Chariton Valley Telephone Corporation, Northeast Missouri Rural Telephone Company, Mid-Missouri Telephone Company, MoKan Dial, Inc., and Alma Telephone Company (Petitioners), by and through counsel, and Respondent Sprint PCS/Sprint Spectrum, by and through counsel, and hereby move for a suspension of the current procedural schedule with respect only to the claims of Petitioners filed against Sprint PCS/Sprint Spectrum contained in the complaints pending in this case.

This request for a suspension of the procedural schedule is made in order to allow consideration of a settlement of the complaints of Petitioners against Sprint PCS/Sprint Spectrum here pending in conjunction with Commission consideration of approval of

traffic termination agreements for the named Petitioners other than MoKan Dial Inc. which would resolve the issues associated with compensation of Sprint PCS/Sprint Spectrum traffic terminating to Petitioners on a prospective basis.

In support of this motion the Petitioners and Sprint PCS/Sprint Spectrum state as follows:

1. Recent settlement discussions between the Petitioners and Sprint PCS/Sprint Spectrum have resulted in a comprehensive financial settlement of the claims of Petitioners against Sprint PCS/Sprint Spectrum for: (1) the time period of traffic pending in this dispute; (2) claims of Petitioners against Sprint PCS/Sprint Spectrum for traffic since the end of the period presently in dispute up until February 4, 2004; and (3) individual Traffic Termination Agreements which, if approved, would address Sprint PCS/Sprint Spectrum traffic terminating to Petitioners on and after February 5, 2004 until the termination of said Traffic Termination Agreements. This settlement is intended to be a comprehensive resolution for Sprint PCS/Sprint Spectrum traffic terminated to Petitioners in the past, as well as into the future.

2. The current procedural schedule in this consolidated case calls for hearings to begin April 20, 2004. Effectuation of the comprehensive settlement cannot be completed before this date, as approval of the Traffic Termination Agreements under the procedures established in 47 USC 252 (e) requires the filings of petitions for approval of the agreements, and a subsequent period of up to 90 days after submission for Commission approval.

3. Petitioners and Respondent Sprint PCS/Sprint Spectrum intend the relief requested herein to be a suspension of the procedural schedule adopted in this case only as it pertains to the issues contested between them, to be effective for as long as it takes the Commission to approve or reject the pending Agreements. If the Agreements are approved, Petitioners will dismiss the complaints pending herein against Respondent Sprint PCS/Sprint Spectrum with prejudice. If the Commission rejects the Agreements, then Petitioners and Sprint PCS/Sprint Spectrum agree that the Commission should reinstitute a procedural schedule for the claims of Petitioners against Sprint PCS/Sprint Spectrum.

WHEREFORE, the Petitioners and Sprint PCS/Sprint Spectrum request that the Commission grant a suspension of the current procedural schedule in this matter as it relates only to Petitioners' complaints against Sprint PCS/Sprint Spectrum on the basis set forth above.

**ANDERECK, EVANS, MILNE,
PEACE & JOHNSON, L.L.C.**

By 

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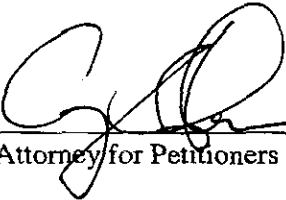
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ATTORNEY FOR SPRINT PCS/SPRINT
SPECTRUM

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and accurate copy of the foregoing was hand delivered or mailed, via U.S. Mail, postage prepaid, this 13 day of April, 2004, to all parties of record in this proceeding.



Attorney for Petitioners