

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

Northeast Missouri Rural Telephone Company	)	
And Modern Telecommunications Company,	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. TC-2002-57, et al
	)	consolidated.
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.	)	

**STAFF’S RESPONSE TO REQUEST FOR SUPPLEMENTAL BRIEFING**

COMES NOW Staff of the Missouri Public Service Commission, and in response to the MITG Companies’ *Request for Supplemental Briefing*, states:

1. The MITG Companies have requested the opportunity to file a “single Simultaneous Supplemental Brief” addressing the impact of a recent FCC decision on this case. SBC Missouri, Inc. has asked for the Commission, as the Commission’s regulation provides, to permit responses to briefs that may be filed by the parties.

2. Staff has no objection to providing the Commission with additional discussion of recent legal developments in this area, and has no objection to a March 30, 2005 date for such submissions. The filings should be limited in scope to discussions of recent legal developments. Staff also agrees with SBC Missouri that the parties should be given the opportunity to respond to any new arguments or discussions put forth by the parties in their initial “Supplemental

Briefs.” Staff also recommends that the Commission extend the date to reply to the “Supplemental Briefs” to April 15, 2005.

WHEREFORE, Staff recommends that the Commission issue an Order permitting the parties to file supplemental briefs limited in scope to discussion of legal developments since the last briefing cycle concluded on or before March 30, 2005, and responses on or before April 15, 2005.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ David A. Meyer**

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#### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 10<sup>th</sup> day of April 2005.

**/s/ David A. Meyer**

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