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December 14, 2004

Mr. Dale Hardy Roberts, Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Case No. TC-2002-1077

Dear Mr. Roberts:

I am in receipt of a letter from Mark Johnson, attorney for T-Mobile USA, Inc. (T-Mobile) purporting to adopt the following Commission approved interconnection agreements between the following entities:

Cass County Telephone - Sprint PCS dated 6/11/2003
Citizens Telephone (Higginsville) - Verizon Wireless dated 1/16/2003
Craw-Kan Telephone Coop - Sprint PCS dated 6/13/2003
Fidelity Telephone - Verizon Wireless dated 2/6/2003
Grand River Mutual Telephone Coop - Sprint PCS dated 5/28/2003
Green Hills Telephone Coop - Sprint PCS dated 5/28/2003
IAMO Telephone - Sprint PCS dated 5/23/2003
Kingdom Telephone - Sprint PCS dated 5/30/2003

The above listed incumbent local exchange carriers (ILECs) are some, but not all, of the complainants in the above-referenced case.

To put T-Mobile's correspondence in perspective, the Commission should be aware that on November 5, 2004, the above listed ILECs (and several other complainants) sent notice to T-Mobile of their intent to disconnect service pursuant to their wireless termination tariffs. (A copy of that correspondence is attached as Attachment 1.) Although this notification was sent on November 5, 2004, none of the ILECs received any communication or correspondence from T-Mobile until its letter dated December 10, 2004, purporting to adopt certain existing interconnection agreements. Therefore, we question the sincerity of this letter given the imminent date of discontinuance and given the fact that the option to adopt existing interconnection agreements pursuant to 47 USC § 252(i) has always been available to T-Mobile for most of the two (2) plus years the Complaint has been pending before the Commission.

December 14, 2004

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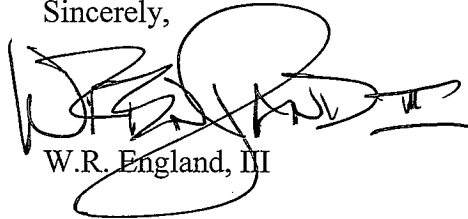
Notwithstanding the sincerity of T-Mobile's proposal, T-Mobile's purported adoption of the referenced interconnection agreements is not appropriate unless it agrees to adopt *those agreements in their entirety*. For example, both the Sprint PCS and Verizon Agreements referenced above contain an identical provision as follows:

"At the same time that the parties execute this agreement, they are entering into a confidential agreement to settle all claims related to traffic exchanged between the parties prior to the effective date of this Agreement. Each party represents that this Settlement Agreement completely and finally resolves all such past claims."¹

As the present Complaint demonstrates, T-Mobile has not settled all claims related to traffic exchanged between it and the above listed ILECs and continues to refuse to pay for terminating wireless traffic in accordance with the ILECs' Commission-approved, wireless tariffs. Accordingly, T-Mobile is not in a position to adopt all of the rates, terms and conditions of the referenced agreements and its proposed adoption is neither appropriate nor effective.

Until such payment is made, the ILECs respectfully request the Commission to reject T-Mobile's request to adopt the above-referenced Agreements.

Sincerely,

A handwritten signature in black ink, appearing to read "W.R. England, III", with a large, stylized flourish extending from the end of the signature.

WRE/da

cc: Judge Kevin Thompson
Mark Johnson
Mike Dandino
Leo Bub
Bill Haas

¹See e.g., Craw-Kan/Sprint PCS Agreement, §5.5; Fidelity/Verizon Wireless Agreement, §5.4.

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November 5, 2004

VIA CERTIFIED U.S. MAIL

VoiceStream/T-Mobile USA
Director of Regulatory Affairs
3650 131st Ave. SE, Suite 200
Bellevue, WA 98006

Re: Discontinuance of Service

To Whom It May Concern:

This office represents the following small rural telephone companies (Small Companies) who provide telecommunications service in the state of Missouri:

Cass County Telephone Company
Citizens Telephone Company of Higginsville
Craw-Kan Telephone Cooperative, Inc.
Fidelity Telephone Company
Grand River Mutual Telephone Corporation
Green Hills Telephone Corporation
Holway Telephone Company
Iamo Telephone Company
Kingdom Telephone Company
KLM Telephone Company
Lathrop Telephone Company
Mark Twain Rural Telephone Company

Since approximately 2001, T-Mobile USA (formerly VoiceStream) has been terminating wireless originated calls to the exchanges served by these Small Companies. These Small Companies have issued bills to T-Mobile for this wireless traffic in accordance with their respective Wireless Termination Service Tariffs which are on file with and approved by the Missouri Public Service Commission. However, T-Mobile has repeatedly refused to pay for the

tariffed charges associated with this terminating wireless traffic. The amounts outstanding as of October 1, 2004, for each of the Small Companies is as follows:

<u>Company</u>	<u>Amount Outstanding</u>
Cass County Telephone Company	\$ 456,480.23
Citizens Telephone Company of Higginsville	511,838.29
Craw-Kan Telephone Cooperative, Inc.	35,847.30
Fidelity Telephone Company	94,631.52
Grand River Mutual Telephone Corporation	192,645.49
Green Hills Telephone Corporation	187,212.24
Holway Telephone Company	9,457.75
Iamo Telephone Company	13,162.47
Kingdom Telephone Company	22,099.58
KLM Telephone Company	7,644.76
Lathrop Telephone Company	63,212.90
Mark Twain Rural Telephone Company	15,989.34

As a result of T-Mobile's refusal and failure to pay for this traffic, these Small Companies have requested that Southwestern Bell Telephone Company (SBC) or Sprint Missouri, Inc. block all T-Mobile traffic destined to the following exchanges and NPA NXXs.

Company Name	Exchange(s)	NPA NXX
Cass County Telephone Company	Creighton	660-499
	Cleveland	816-618
	Drexel	816-619
	East Lynne	816-626
	Drexel	816-657
	Cleveland	816-658
	Peculiar	816-758
	Garden City	816-773
	Peculiar	816-779
	Garden City	816-862
	East Lynne	816-869
Citizens Telephone Company	Higginsville	660-584
	Corder	660-394
	Mayview	660-237

Craw-Kan Telephone Cooperative, Inc.	Amoret	660-925
	Amsterdam	660-267
	Foster	660-832
	Hume	660-643
	Pleasanton	660-447
	Arcadia	417-639
	Mulberry	417-769
	Asbury	417-642
	Purcell	417-525
Fidelity Telephone Company	Sullivan	573-468/573-860
	Stanton	573-927
	Spring Bluff	573-457
	Japan	573-627
	Gerald	573-764
	Owensville	573-437
	New Haven	573-237
	Lyon	573-459
	Berger	573-834
Grand River Mutual Telephone Corporation	Galt	660-673
	Chula	660-639
	Purdin	660-244
	Laredo	660-286
	Meadville	660-938
	Browning	660-946
	Linneus	660-895
	Conception Jct.	660-944
	Ravenwood	660-937
	Graham	660-939
	Parnell	660-986
	Denver	660-326
	Barnard	660-652

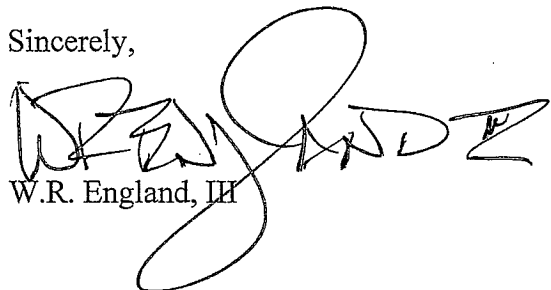
	Sheridan	660-799
	Darlington	660-666
	Gentry	660-448
	Bethany	660-425
	Bethany	660-426
	Mt. Moriah	660-824
	Washington Center	660-845
	Eagleville	660-867
	Ridgeway	660-872
	Gilman City	660-876
	Cainsville	660-893
	New Hampton	660-439
	Spickard	660-485
	Powersville	660-592
	Jamesport	660-684
	Princeton	660-748
	Brimson	660-789
	Lucerne	660-793
	Mercer	660-382
	Newtown	660-794
Green Hills Telephone Corporation	Avalon	660-636
	Bogard	660-731
	Breckenridge	660-644
	Cowgill	660-255
	Dawn	660-745
	Knoxville	660-352
	Lock Springs	660-772
	Ludlow	660-738
	Mooreville	660-755
	Polo	660-354
	Stet	660-484
	Tina	660-622
	Wheeling	660-659

Holway Telephone Company	Maitland	660-935
	Skidmore	660-928
Iamo Telephone Company	Burlington Junction	660-725
	Clearmont	660-729
	Elmo	660-742
	Westboro	660-984
Kingdom Telephone Company	Rhineland	573-236
	Big Spring	573-252
	Williamsburg	573-254
	Auxvasse	573-386
	Hatton	573-387
	Tebbetts	573-295
	Mokane	573-676
KLM Telephone Company	Rich Hill	417-395
	Metz	417-484
	Richard	417-927
	Deerfield	417-966
Lathrop Telephone Company	Lathrop	816-528
	Lathrop	816-740
Mark Twain Rural Telephone Company	Baring	660-892
	Bethel	660-284
	Brashear	660-323
	Durham/Maywood	573-478
	Greentop	660-949
	Hurdland	660-423
	Knox City	660-434
	Leonard	660-762

	Newark	660-733
	Novelty	660-739
	Philadelphia	573-439
	Steffenville	660-278
	Williamstown	573-853
	Wyaconda	660-479

Accordingly, please be advised that unless T-Mobile pays in full the amounts indicated above for each of the Small Companies, wireless originated calls from T-Mobile to the above listed exchanges and NPA/NXXs will be blocked on and after December 15, 2004. Correspondence and/or communication regarding this matter should be directed to me at the above address.

Sincerely,


W.R. England, III

WRE/da

cc: Mr. Dan Menser (T-Mobile/USA)
Mr. Mark Johnson (T-Mobile/USA)
Mr. Leo Bub (SWBT)
Mr. Kenneth Schifman (Sprint)
Mr. John VanEschen (MoPSC)
Clients