

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

Application of Missouri RSA No. 5 Partnership d/b/a)
Chariton Valley Wireless for Approval of a Direct)
Interconnection Agreement and for a Related Indirect) Case No. TK-2005-0447
Transiting Traffic Services Agreement with Southwestern)
Bell Telephone, L.P. d/b/a SBC Missouri, Pursuant to the)
Telecommunications Act of 1996.)

**SBC MISSOURI'S MOTION
FOR EXTENSION OF TIME TO RESPOND**

Southwestern Bell Telephone, L.P., d/b/a SBC Missouri ("SBC Missouri"), respectfully requests that the Commission extend the date by which SBC Missouri is permitted to file its response to the Missouri Independent Telephone Group's ("MITG's") Application to Intervene or Alternative Application to Participate without Intervention or Alternative Application to Address an Issue as Amicus and Opposition to the Basis for SBC's Objection ("Application/Opposition"), to through and including noon on Tuesday, June 12, 2005. In support of its Motion, SBC Missouri states as follows:

1. This case was opened when Missouri RSA No. 5 Partnership d/b/a Chariton Valley Wireless ("CVW") filed, on May 27, 2005, an application for approval, pursuant to Section 252 of the Telecommunications Act of 1996 ("the Act"), of both an ICA and a Transit Agreement entered into between CVW and SBC Missouri.¹ On June

¹ The ICA is comprised of the Cellular/PCS Interconnection Agreement and amendment thereto which are attached to CVW's application as Attachment 1. The Transit Agreement is comprised of the Wireless Service Provider Agreement, as well as the associated Transit Traffic Services Appendix (Wireless) and Transit Traffic rate sheet attached to CVW's application as Attachment 2.

14, 2005, SBC Missouri filed its objections to the portion of CVW's application requesting Commission approval of the Transit Agreement (but not to the ICA).

2. On June 23, 2005, MITG filed its Application/Opposition with the Commission. The Application requests that the MITG "be permitted to intervene as parties, or be permitted to participate without intervention, or that they be permitted to participate as Amicus" in this case and that the Commission reject the Transit Agreement. Application/Opposition, p. 11.

3. Commission Rule 2.080(15), 4 CSR 240-2.080(15), permits a party not more than ten days from the date of filing in which to respond to any pleading unless otherwise ordered by the Commission. No order has been entered relative to the matter of responding to MITG's Application/Opposition. Therefore, SBC Missouri's response to MITG's Application/Opposition, is presently due by not later than July 5, 2005 (July 4 being a holiday).

4. The undersigned counsel has been extensively involved in proceedings regarding the "post-M2A" (i.e., post-Missouri 271 Interconnection Agreement" (Case No. TO-2005-0336). SBC Missouri needs additional time to review and consider the matters stated in MITG's Application/Opposition and, given the upcoming holiday weekend, there is not sufficient time to do so before July 5. The undersigned has spoken with Mr. Craig Johnson (for CVW and MITG), Mr. Bill Haas (for Staff), and an assistant to Mr. Lewis Mills (for OPC), and none of the parties has any objection to the Commission's granting SBC Missouri's motion.

WHEREFORE, SBC Missouri respectfully requests that the Commission grant SBC Missouri an additional period of time in which to respond (i.e., to object or otherwise address) to MITG's Application/Opposition, through and including noon on Tuesday, June 12, 2005.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.


BY 

PAUL G. LANE	#27011
LEO J. BUB	#34326
ROBERT J. GRYZMALA	#32454
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone, L.P.
One SBC Center, Room 3516
St. Louis, Missouri 63101
314-235-6060 (Telephone)
314-247-0014 (Facsimile)
robert.gryzmala@sbc.com

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on or about July 1, 2005.


Robert J. Grymalala

GENERAL COUNSEL
MARC D. POSTON
MISSOURI PUBLIC SERVICE COMMISSION
PO BOX 360
JEFFERSON CITY, MO 65102
marc.poston@psc.mo.gov

PUBLIC COUNSEL
MICHAEL DANDINO
OFFICE OF THE PUBLIC COUNSEL
PO BOX 7800
JEFFERSON CITY, MO 65102
mike.dandino@ded.mo.gov

CRAIG S. JOHNSON
ANDERECK, EVANS, MILNE, PEACE &
JOHNSON, LLC
PO BOX 1438
JEFFERSON CITY, MO 65102
mjohnson@sonnenschein.com