

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

Northeast Missouri Rural Telephone Company	)	
and Modern Telecommunications Company,	)	
et al.	)	
	)	
Petitioners,	)	
	)	
v.	)	Case No. TC-2002-57,
	)	Case No. TC-2002-113
	)	Case No. TC-2002-114
	)	Case No. TC-2002-167
	)	Case No. TC-2002-181
Southwestern Bell Telephone Company,	)	Case No. TC-2002-182
Southwestern Bell Wireless (Cingular),	)	consolidated.
Voicestream Wireless (Western Wireless),	)	
Aerial Communications, Inc., CMT Partners	)	
(Verizon Wireless), Sprint Spectrum LP,	)	
United States Cellular Corp., and Ameritech	)	
Mobile Communications, Inc., et al.	)	
	)	
Respondents.	)	

**MITG Reply to SBC Opposition to Consolidation**

Come now Petitioners and submit the following Reply to SBC's October 3, 2005  
Opposition to Motion to Consolidate:

1. Petitioners seek the most effective utilization of the time and resources of themselves, Mid-Missouri Telephone Company, the Commission, T-Mobile, and SBC. Petitioner believes the issues to be resolved in this complaint and in TC-2006-0127 are of sufficient similarity that it would be preferable to address all uncompensated traffic periods in a single determination rather than utilize three determinations: one for the 1998-2001 period submitted in TC-2002-57; a second for the 2001-2005 period added by the amended complaints in TC-2002-57; and a third for TC-2006-0127.

2. TC-2002-57 has been submitted for determination twice. The first time it was under submission for an extended period prior to the Order Reopening the Record. The second time it was submitted for determination was in 2004, and it has remained under submission without decision for over a year.

3. The purpose of the amended complaints, and the motion to consolidate, is to allow a single determination of all claims of the MITG, including Mid-Missouri, against SBC and T-Mobile.

4. It is true that the consolidation of the amended complaints and this complaint will require the record to be reopened to provide the parties an opportunity to contest the T-Mobile traffic terminating between the end of 2001 and the effective date of the T-Mobile/MITG traffic termination agreements, January 13, 2005.

5. The Commission previously preferred reopening the record for a single decision rather than utilize separate determinations. Petitioners have no reason to believe this preference does not still apply.

6. Granting the Motions to Consolidate will be the best and most efficient utilization of the resources of the Commission and remaining parties in TC-2002-57, and Mid-Missouri.

/s/  
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of this pleading was electronically mailed to the attorneys for T-Mobile, SBC, Staff, and OPC this 5th day of October, 2005.

/s/  
Craig S. Johnson