

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

BPS Telephone Company, Cass County Telephone	)	
Company, Citizens Telephone Company of	)	
Higginsville, Missouri, Craw-Kan Telephone	)	
Cooperative, Inc., Fidelity Communications	)	
Services I, Inc., Fidelity Telephone Company,	)	
Grand River Mutual Telephone Corporation,	)	
Green Hills Telephone Corporation, Holway	)	
Telephone Company, Iamo Telephone Company,	)	
Kingdom Telephone Company, K.L.M. Telephone	)	
Company, Lathrop Telephone Company and	)	
Mark Twain Rural Telephone Company,	)	Case No. TC-2002-1077
	)	
Complainants,	)	
	)	
vs.	)	
	)	
VoiceStream Wireless Corporation, Western	)	
Wireless Corporation and Southwestern Bell	)	
Telephone Company,	)	
	)	
Respondents.	)	

**SBC MISSOURI'S OBJECTION  
TO NON-UNANIMOUS STIPULATION**

SBC Missouri<sup>1</sup> pursuant to 4 CSR 240-2.115(2)(b), respectfully objects to the non-unanimous stipulation<sup>2</sup> filed July 11, 2003 by Complainants and Respondent T-Mobile USA, Inc. (f/k/a VoiceStream), and requests a hearing.

---

<sup>1</sup> Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, will be referred to in this pleading as "SBC Missouri" or "SBC."

<sup>2</sup> SBC Missouri, however, does not oppose Complainants' and Respondent T-Mobile USA's motion to file out of time.

SBC Missouri does not believe the interMTA factors set out in the non-unanimous stipulation are sufficiently substantiated and questions the accuracy of the factors. SBC Missouri therefore respectfully requests the Commission to schedule the matter for hearing.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY




PAUL G. LANE	#27011
LEO J. BUB	#34326
ANTHONY K. CONROY	#35199
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone, L.P.  
One SBC Center, Room 3518  
St. Louis, Missouri 63101  
314-235-2508 (Telephone) 314-247-0014 (Facsimile)  
[leo.bub@sbctel.com](mailto:leo.bub@sbctel.com)

**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on July 16, 2003



---

Leo J. Bub

BRUCE BATES  
MISSOURI PUBLIC SERVICE COMMISSION  
PO BOX 360  
JEFFERSON CITY, MO 65102

MICHAEL F. DANDINO  
OFFICE OF THE PUBLIC COUNSEL  
PO BOX 7800  
JEFFERSON CITY, MO 65102

MARK P. JOHNSON  
SONNENSCHN, NATH & ROSENTHAL  
4520 MAIN STREET, SUITE 1100  
KANSAS CITY, MO 64111

GENE DEJORDY  
WESTERN WIRELESS CORPORATION  
3650 131<sup>st</sup> AVENUE SE, SUITE 400  
BELLEVUE, WASHINGTON 98006

WILLIAM R. ENGLAND, III  
BRIAN T. MCCARTNEY  
BRYDON, SWEARENGEN & ENGLAND  
PO BOX 456  
JEFFERSON CITY, MO 65102

DAN MENSER  
T-MOBILE USA, INC.  
12920 SE 38TH STREET  
BELLEVUE, WA 98006