

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

In the Matter of the Arbitrated Interconnection        )  
Agreement between Mid-Missouri Telephone        )        Case No. TK-2006-0167  
Company And T-Mobile USA, Inc.                    )

**STATEMENT OF T-MOBILE USA, INC.**

Comes now T-Mobile USA, Inc., by its undersigned attorneys, and submits this Statement in response to the Order Directing Filing issued on October 24, 2005.

T-Mobile agrees with Staff’s recommendations that the Commission should approve the proposed agreement because it “conforms to the Arbitrator Report and the Commission’s Arbitration Order in Case No. IO-2005-2468.”<sup>1</sup> T-Mobile further agrees with Staff that the title of the agreement should be changed from “Traffic Termination Agreement” to “Interconnection Agreement” for the reasons Staff identifies.<sup>2</sup>

Section 252(e)(2) of the Communications Act specifies that a State commission “may only reject”:

- (b) an agreement (or any portion thereof) adopted by the arbitration under subsection (b) of this section if *it* finds that the agreement does not meet the requirements of section 251 of this title, including the regulations prescribed by the [FCC] pursuant to section 251 of this title, or the standards set forth in subsection (d) of this section.<sup>3</sup>

The October 24, 2005 order asks T-Mobile to “state the reasons it believes it arbitrated interconnection agreement does not comply with Sections 251 and 252 of the Telecommunications Act of 1996.” The parties have taken the position that the proposed

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<sup>1</sup> Staff Recommendations, at 1 ¶ 5 (Oct. 24, 2005).

<sup>2</sup> *See id.* at 2 ¶ 5.

<sup>3</sup> 47 U.S.C. § 252(e)(2)(B).



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**Certificate of Service**

I hereby certify that a true and final copy of the foregoing was served via electronic transmission on this 27th day of October, 2005, to the following counsel of record:

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/s/ Mark P. Johnson