



right to demand negotiation from Harrisonville or the other rural LECs. Similarly, to the extent that Sprint's request is in fact a request for interconnection under Section 251(c), Harrisonville agrees with Staff that the same factual and policy issues will apply.

To the extent, however, that this Petition goes forward as a request for a suspension under Section 251(f)(2), the factual issues for each of the rural LECs, including the economic impact of agreement Sprint seeks, are likely to be different for each of the rural LECs. Therefore, consolidating the suspension requests is likely to lead to confusion about which evidence applies to which rural LEC and may raise questions about how each rural LEC has met its burden of proof.

### **Conclusion**

Therefore, Harrisonville suggests that the dockets be consolidated only for the purpose of Commission action on the first two elements of each Petition, *i.e.*, the impact of Sprint's status as a private telecommunications provider and whether Sprint's negotiation request implicates any Section 251(c) obligations. If, after considering these issues, the Commission concludes that there are residual obligations that can only be handled through suspension requests, the dockets should be deconsolidated for the purpose of hearing those suspension requests.

Dated this 10<sup>th</sup> day of May, 2005.

Respectfully submitted,

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CERTIFICATE OF SERVICE

(Docket No. 05-0275)

A copy of Harrisonville Telephone Company's Response To Staff Request For Consolidation was served upon the following persons by e-mail this 10<sup>th</sup> day of May, 2005.

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