

**BEFORE THE STATE CORPORATION COMMISSION OF
THE STATE OF KANSAS**

In the Matter of the Application of i-wireless,)
LLC for Designation as an Eligible) Docket No. 12-IWRZ-848-ETC
Telecommunications Carrier in the State of)
Kansas)

PETITION FOR RECONSIDERATION

Come now Cunningham Telephone Company ("Cunningham"), LaHarpe Telephone Company ("LaHarpe"), Moundridge Telephone Company ("Moundridge"), Wamego Telecommunications Company ("Wamego") and Zenda Telephone Company ("Zenda," together the "movants/petitioners") and request reconsideration of the statutory denial of their motion filed herein June 4, 2015 to the extent such request may be a prerequisite to judicial review. In support thereof the petitioners and movants state as follows:

1. On June 4, 2015 the movants filed their motion requesting that the commission reopen this proceeding, permit them to intervene and thereupon rescind so much of the Commission's Order of September 6, 2012 as purported to redefine each of the movants' study areas without notice to the respective movants.

2. Although Commission Staff filed a response to the Movants' motion and petition of June 4, 2015, the Commission has taken no action thereon within thirty days. Pursuant to K.S.A. 77-529(b) it is arguable that the motion and associated relief, including a request for modification of a prior Order, were denied by operation of law; if so, pursuant to K.S.A. 77-529 a petition for "reconsideration" may be required as a prerequisite to judicial review.

3. In the absence of an Order making specific findings and conclusions of law, the movants/petitioners request reconsideration generally of the statutory denial through inaction of all aspects of the movants/petitioners' motion, petition and associated relief that have been denied by operation of statute, including the motion to reopen the proceeding, the petition for leave to intervene and the request for rescission of the prior Order redefining the movants/petitioners' respective study areas and communication of such rescission to the Federal Communications Commission with a request for concurrence, all for the reasons set forth in the Motion of June 6, 2015.

WHEREFORE these movants/petitioners request that the Commission reconsider its denial by operation of law of all relief requested in the Motion of June 4, 2015, including reopening this Docket, granting the movants' intervention, and thereon review and rescission only of so much of the Order of September 6, 2012 as redefines the respective study areas of the movants/petitioners, and thereupon forwarding to the Federal Communications Commission notice of such rescission with the request that the FCC concur therein by restoring the prior study area definition of each of the movants

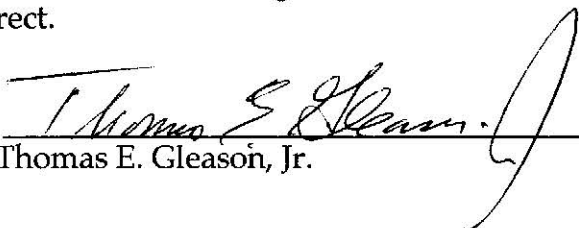
Respectfully submitted,


Thomas E. Gleason, Jr. #07741
GLEASON & DOTY, CHARTERED
P.O. Box 6
Lawrence, KS 66044
(785) 842-6800 ph
(785) 856-6800 fax
gleason@sunflower.com
Attorney for movants/petitioners

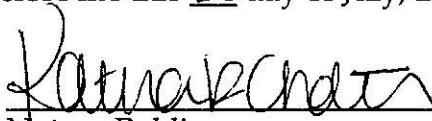
VERIFICATION

STATE OF KANSAS, DOUGLAS COUNTY, ss:

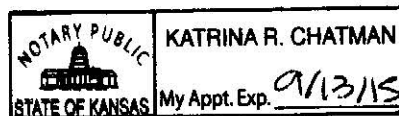
Thomas E. Gleason, Jr., of lawful age, being first duly sworn, on his oath states: he is the attorney for the movants identified herein; that he has read the above and foregoing Petition; that the statements, allegations and matters contained therein are true and correct.


Thomas E. Gleason, Jr.

Subscribed and sworn to before me this 20 day of July, 2015.


Notary Public

My Appointment Expires: 9/13/15



CERTIFICATE OF SERVICE

Thomas E. Gleason, Jr. certifies that the above and foregoing ~~petition~~^{TG} Petition was served on the following by mailing a copy thereof to each on the 20th day of July, 2015:

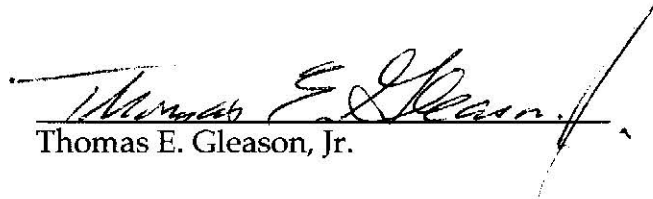
John Willis
I-Wireless, LLC
1 Levee Way, Ste 3104
Newport, KY 41071-1661

Diane Browning
Attorney for I Wireless, LLC
6450 Sprint Pkwy
Overland Park, KS 66251

Lance J. M. Steinhart, attorney
Lance J. M. Steinhart, P.C.
1725 Windward Concourse Suite 150
Alpharetta, GA 30005

Michael Neeley, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Otto Newton, Litigation Counsel
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027


Thomas E. Gleason, Jr.