# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Request for the modification	)	
Of the Springfield Metropolitan Calling Area	)	
Plan to Make the Ozark Exchange a Mandatory	)	Case No. TO-2005-0143
MCA Tier 1 Exchange.	)	

### JOINT MOTION TO FURTHER EXTEND FILING DATES

COME NOW the Office of the Public Counsel ("Public Counsel") and CenturyTel of Missouri, LLC ("CenturyTel") (collectively referred to herein as "Joint Movants"), pursuant to Commission Rule 4 CSR 240-2.080, and for their Joint Motion To Further Extend Filing Dates respectfully state as follows:

- 1. By their Joint Request For An Extension Of Time filed in this matter on August 14, 2006, the Joint Movants notified the Commission that they believed a proposed resolution of the expanded calling issue in the Ozark exchange was imminent that would obviate a procedural schedule and evidentiary hearing. In response, the Commission issued its Order Granting Joint Request For Extension Of Time on August 17, 2006, extending the filing of a proposed procedural schedule and company statements of revenue and expense statements, as well as revenue-neutrality requirements, to September 14 and October 14, 2006, respectively.
- 2. On August 16, 2006, CenturyTel filed its Application for CPI-TS Reduction Waiver initiating Case No. IE-2007-0077, wherein CenturyTel specifically referenced the instant proceeding and proposed to utilize all revenues attributable to such CPI-TS reduction waiver to benefit local exchange ratepayers in CenturyTel's Ozark exchange and facilitate expanded local calling by reducing the current MCA Tier 2 rate

for Ozark residential and business customers. As noted in the Application, Public Counsel supported the relief requested therein. The Commission issued its Order Directing Notice and Directing Filings on the following day and, on August 22, 2006, CenturyTel filed a Notice of Voluntary Dismissal of Application and Withdrawal of Tariff. On August 25, 2006, the Commission issued its Notice of Voluntary Dismissal and Notice Closing Case in Case No. IE-2007-0077.

- 3. While the above-referenced proposal was a component of the Joint Movants' proposed resolution, Joint Movants nevertheless continue to believe that resolution of the expanded calling issue in the Ozark exchange is imminent. However, these parties will need additional time to reach a resolution in this matter.
- Accordingly, and in the interests of judicial efficiency to avoid requests for additional extensions, Joint Movants request that the Commission extend the current deadlines by sixty (60) days respectively, so that the proposed procedural schedule would be due no later than November 13, 2006, and the revenue/expense impacts and revenue-neutrality filings would be due December 13, 2006.
- 5. Joint Movants are authorized to state that the Staff of the Commission, Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri, Choctaw Telephone Company and Windstream Missouri, Inc. do not object to the relief requested herein.

WHEREFORE, Joint Movants respectfully request that the current filing dates of September 14 and October 14, 2006, be extended for sixty (60) days respectively as set forth herein.

# Respectfully submitted,

## OFFICE OF THE PUBLIC COUNSEL

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By:

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## CENTURYTEL OF MISSOURI, LLC

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### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 14<sup>th</sup> day of September, 2006, to:

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