## NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
MONROE BLUFF EXECUTIVE CENTER
601 MONROE STREET, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MISSOURI 65102-0537

www.ncrpc.com
February 10, 2005

TELEPHONE: (573) 634-2266 FACSIMILE: (573) 636-3306



Missouri Public Service Commission

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Re:

ROBERT K. ANGSTEAD

ROBERT J. BRUNDAGE

CATHLEEN A. MARTIN

Stephen G. Newman

MARK W. COMLEY

JOHN A. RUTH

MCC Telephony of Missouri, Inc.

Case No. LA-2005-0150

Dear Judge Roberts:

Please find enclosed for filing on behalf of MCC Telephony of Missouri, Inc. the original and five copies of a Motion for Extension of Time to File Proposed Joint Procedural Schedule.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

comleym@ncrpc.com

MWC:ab Enclosure

cc:

Office of Public Counsel General Counsel's Office

Craig Johnson Sondra B. Morgan Kate O'Donnell

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

FIL	ED <sup>2</sup>
FEB 1 0	2005
1/880	-00

In the Matter of the Application of	)	Service Commission
MCC Telephony of Missouri, Inc.	)	Commobile
for a Certificate of Service Authority	)	"Mission
to Provide Basic Local Exchange,	)	Case No. LA-2005-0150
Non-Switched Local Exchange and	)	
Interexchange Telecommunications Service	)	
In the State of Missouri and to Classify said	)	
Services and the Company as Competitive	)	

## MOTION FOR EXTENSION OF TIME TO FILE PROPOSED JOINT PROCEDURAL SCHEDULE

COMES NOW MCC Telephony of Missouri, Inc. (MCC or Company) and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to file a proposed joint procedural schedule. In support thereof, MCC submits the following:

- 1. In its Order dated January 24, 2005, the Commission directed that a proposed joint procedural schedule be filed on or before February 10, 2005.
- 2. At the prehearing conference for this matter held on February 3, 2005, the parties engaged in discussions regarding a stipulation to propose to the Commission. Those discussions continue and additional time for consideration of a stipulation would assist the parties.
- 3. MCC requests an additional two weeks, to February 24, 2005, to file the proposed joint procedural schedule in this matter.
- 4. The extension sought will not prejudice any party to the action and will not unfairly delay the disposition of this cause.
- 5. The Office of Public Counsel, the attorneys for the Staff and interveners have advised the undersigned that they have no objection to this request.

WHEREFORE, MCC respectfully requests the Commission to issue an Order extending the time within which it may file a proposed joint procedural schedule for two weeks, up to and including February 24, 2005.

Respectfully submitted,

Mark W. Comley

#28847

Newman, Comley & Ruth P/C.

601 Monroe Street, Suite 301

P.O. Box 537

Jefferson City, MO 65102

(573) 634-2266

(573) 636-3306 FAX

Attorney for MCC Telephony of Missouri, Inc.

## Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 10th day of February, 2005, to General Counsel's Office at gencounsel@psc.state.mo.us; Office of Public Counsel at opcservice@ded.state.mo.us; Craig Johnson at cjohnson@aempb.com; and Sondra Morgan at smorgan@brydonlaw.com