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February 26, 2008

Ms. Colleen Dale Secretary and Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

In the Matter of the Application of MCC Missouri, LLC for Video RE: Service Authorization Case No. KA-2008-0061

Dear Ms. Dale:

Enclosed for filing please find a Request for Delay in Issuance of Order with regard to the above-referenced matter, filed on behalf of Greene County, Missouri.

If you have any questions or need any further information, please do not hesitate to contact me. Thank you.

Very truly yours,

OFFICE OF GREENE COUNTY COUNSELOR

Housley

JWH:jjj Enclosure

Mr. Ricahrd S. Brownless, III

Ms. Nancy Yendes

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BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of)	
MMC Missouri LLC)	Case No. KA-2008-0061
For Video Service Authorization)	

REQUEST FOR DELAY IN ISSUANCE OF ORDER

COMES NOW the Greene County, Missouri, and requests that this Commission not issue its Order for a Video Authorization to provide video service within the unincorporated areas of Greene County, Missouri for MMC Missouri LLC (hereinafter "Company") until March 7, 2008, thirty days after the filing of the Notice of Change of Application, for the following reasons:

- 1. The Company has abandoned the refranchising process under federal law.
- 2. Greene County, Missouri had in place prior to the effective date of SB 284 a master video franchise with the applicant that, in the absence of a statewide authorization, would control the provision of video service within the unincorporated areas of Greene County, Missouri.
- 3. The County did not receive notice of this Notice of Change of Application, but was recently informed that it had to be filed by counsel for the City of Springfield listed on the certificate of service.
- 4. That the County requires the full remaining thirty (30) days notice to consider its options under federal and state law with respect to response, if any, to the Company's notice.

5. That the Commission is not obligated to issue any order until thirty (30) days has passed after the filing of the Notice of Change, under Section 67.2679.7, RSMo Supp 2007, which would not be any earlier than March 7, 2008.

WHEREFORE, Greene County, Missouri requests that the Commission not issue an order authorizing the Company to provide video service within the unincorporated areas of Greene County, Missouri before March 7, 2008.

Respectfully submitted,

OFFICE OF GREENE OUNTY COUNSELOR

BY:

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was delivered by first class mail on this 25th day of February, to the following as attorney for the Company: Mr. Richard S. Brownlee III, Hendren Andrae, LLC, 221 Bolivar Street, Suite 300 Jefferson City, MO 65102, <u>richardv@hendrenandrae.com</u>, Fax: 573-636-5226; and to Ms. Nancy K. Yendes, Assistant City Attorney for City of Springfield, 840 N. Boonville, Springfield, MO 54802, nyendes@springfieldmo.gov, Fax: 417-864-1551.

John W. Housley