

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

In the Matter of Staff’s Review of the Commission’s     )  
Chapter 31 Rules   )     **File No. TW-2017-0078**

In the Matter of Staff’s Review of the Commission’s     )  
Chapter 28 Rules   )     **File No. TW-2018-0098**

**JOINT MOTION FOR EXTENSION OF TIME**

COME NOW the Missouri Small Telephone Company Group (STCG) and Missouri Independent Telephone Company Group (MITG) (hereinafter collectively referred to as the STCG )<sup>1</sup>, AT&T <sup>2</sup>, CenturyLink <sup>3</sup>, Windstream Missouri, LLC and FairPoint Communications Missouri, Inc. d/b/a FairPoint Communications (collectively “Joint Movants”) and for their Joint Motion for Extension of Time respectfully state as follows:

1.     On October 17, 2017, the Staff of the Missouri Public Service Commission (“Staff) filed its “Request for Comments” in File No. TW-2017-0078, and “Staff Motion To Open New Docket and Request for Comments” initiating File No. TW-2018-0098. As reflected in those pleadings, these dockets address proposed changes to Commission Rules 4 CSR 240 Chapter 31 and 4 CSR 240 Chapters 28 and 37, respectively. Staff further notes that pursuant to the governor’s Executive Order 17-03,

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<sup>1</sup> See Attachment A.

<sup>2</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri, and its affiliates will be referred to herein as “AT&T.”

<sup>3</sup> “CenturyLink” includes CenturyTel of Missouri, LLC d/b/a CenturyLink; Spectra Communications Group, LLC d/b/a CenturyLink, Embarq Missouri, Inc. d/b/a CenturyLink and CenturyTel of Northwest Arkansas, LLC d/b/a CenturyLink.

state agencies have been asked to review their currently effective rules and propose changes to make the rules more efficient and effective.

2. The Staff attaches its proposed changes to the above-referenced rules as “Attachment A” to each pleading. As noted in each Attachment A, the proposed changes rescind, replace, streamline and establish new provisions in these important rules impacting the telecommunications industry.

3. In both of its pleadings, Staff “asks all interested parties to review its proposed changes and submit any comments and suggestions no later than October 23, 2017” – a time-frame of four (4) business days.

4. While the Staff notes that, in the Chapter 31 review docket, it has “held a workshop and received follow-up comments from interested parties as to the proposed changes,” the proposed changes set forth in both attachments are substantial and many have not been discussed with the industry. As a practical matter, the Joint Movants cannot review and offer substantive comments in the Staff’s proposed time-frame, and respectfully request at least thirty (30) days for review and the submission of comments and suggestions.

5. On October 18, the Commission issued an Order regarding Staff’s review of its Chapter 28 and 37 Rulemakings and directing “[a]ny stakeholder wishing to file comments regarding the rule changes proposed by Staff shall do so no later than October 23, 2017.”

6. This Joint Motion is not filed for purposes of delay or to impede the Commission’s actions in accordance with the above-referenced Executive Order.

WHEREFORE, the Joint Movants respectfully request at least thirty days to review the Staff's proposed changes and to submit any comments and suggestions in the above-captioned matters.

Respectfully submitted,

**Brydon, Swearngen & England, P.C.**

/s/ Trip England  
W. R. England, III                      Mo. Bar #23975  
Brian T. McCartney                      Mo. Bar #47788  
312 East Capitol Avenue  
P. O. Box 456  
Jefferson City, Missouri 65102-0456  
Telephone: (573) 635-7166  
Facsimile: (573) 634-7431  
Email: [trip@brydonlaw.com](mailto:trip@brydonlaw.com)  
[bmccartney@brydonlaw.com](mailto:bmccartney@brydonlaw.com)

Attorneys for Missouri STCG

**Johnson and Sporleder, LLP**

/s/ Craig S. Johnson  
Craig S. Johnson  
2420 Hyde Park Road, Suite C  
Jefferson City, MO 65109  
(573)659-8734  
(573)761-3587 fax  
[cj@cjaslaw.com](mailto:cj@cjaslaw.com)

Attorney for MITG

**Southwestern Bell Telephone Company  
d/b/a AT&T Missouri**

/s/ Leo J. Bub  
LEO J. BUB #34326  
AVP - Senior Legal Counsel  
1010 Pine Street, Room 19E-D-01  
St. Louis, MO 63101  
(314) 396-3679  
[leo.bub@att.com](mailto:leo.bub@att.com)

**CenturyLink**

/s/ Becky Owenson Kilpatrick

Becky Owenson Kilpatrick, Mo. Bar No. 42042  
CenturyLink  
100 CenturyLink Drive  
Monroe, LA 71203  
Phone: (318) 340-5027  
Becky.kilpatrick@centurylink.com

/s/ Larry W. Dority

Larry W. Dority, MBN 25617  
Fischer & Dority, P.C.  
101 Madison Street, Suite 400  
Jefferson City, MO 65101  
Telephone: (573) 636-6758  
Facsimile: (573) 636-0383  
E-mail: lwdority@sprintmail.com

Attorneys for:

**FairPoint Communications Missouri, Inc.**  
**d/b/a FairPoint Communications**  
and  
**Windstream Missouri, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 18<sup>th</sup> day of October, 2017.

/s/ Trip England

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## ATTACHMENT A

### **Missouri Small Telephone Company Group**

BPS Telephone Company  
Citizens Telephone Company of Higginsville, Mo.  
Craw-Kan Telephone Cooperative, Inc.  
Ellington Telephone Company  
Farber Telephone Company  
Fidelity Telephone Company  
Goodman Telephone Company  
Granby Telephone Company  
Grand River Mutual Telephone Corporation  
Green Hills Telephone Corporation  
Holway Telephone Company  
Iamo Telephone Company  
Kingdom Telephone Company  
K.L.M. Telephone Company  
Le-Ru Telephone Company  
Lathrop Telephone Company  
Mark Twain Rural Telephone Company  
McDonald County Telephone Company  
Miller Telephone Company  
New Florence Telephone Company  
New London Telephone Company  
Northeast Missouri Rural Telephone Company  
Orchard Farm Telephone Company  
Ozark Telephone Company  
Peace Valley Telephone Company, Inc.  
Rock Port Telephone Company  
Seneca Telephone Company  
Steelville Telephone Exchange, Inc.  
Stoutland Telephone Company

### **Missouri Independent Telephone Company Group**

Alma Communications Company d/b/a Alma Telephone Company  
Chariton Valley Telephone Corporation  
Choctaw Telephone Company  
MoKAN DIAL Inc.  
Oregon Farmers Mutual Telephone Company  
Otelco Mid-Missouri, LLC