

Commissioners
KELVIN L. SIMMONS
Chair
CONNIE MURRAY
SHEILA LUMPE
STEVE GAW
BRYAN FORBIS

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.state.mo.us>

April 1, 2002

ROBERT J. QUINN, JR.
Executive Director
WESS A. HENDERSON
Director, Utility Operations
ROBERT SCHALLENBERG
Director, Utility Services
DONNA M. PRENGER
Director, Administration
DALE HARDY ROBERTS
Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

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

RE: Case No. TO-2000-374

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of **STAFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO SPRINT AND SOUTHWESTERN BELL TELEPHONE COMPANY.**

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

William K. Haas
Deputy General Counsel
(573) 751-7510
(573) 751-9285 (Fax)

WKH:sw
Enclosure
cc: Counsel of Record

FILED²
APR 01 2002
Missouri Public
Service Commission

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

FILED²
APR 01 2002
Missouri Public
Service Commission

In the Matter of the Petition of the North)
American Numbering Plan Administrator,)
on behalf of the Missouri Telecom-)
munications Industry, for Approval of NPA)
Relief Plan for the 314 and 816 Area Codes)

Case No. TO-2000-374

**STAFF'S MOTION FOR EXTENSION OF TIME TO RESPOND TO
SPRINT AND SOUTHWESTERN BELL TELEPHONE COMPANY**

COMES NOW the Staff of the Missouri Public Service Commission and states:

1. In its Order Regarding Cost Allocation And Cost Recovery For State Number Pooling Trials issued December 18, 2001, the Commission directed the industry to submit a proposal for recovery of carrier specific costs, including joint costs allocated to a specific carrier, no later than March 22, 2002. The Order further directed the Staff to submit its report and recommendation regarding the industry proposal no later than April 22, 2002.

2. On March 22, 2002, Sprint Communications Company, L.P. and Sprint Missouri, Inc., d/b/a Sprint (collectively Sprint) filed the Response Of Sprint Regarding Cost Allocation And Cost Recovery For State Number Pooling Trials asking for an open-ended delay in the date for the industry to submit final proposals. Also on March 22, Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company (SWBT) filed a Motion For Extension Of Time To Submit A Proposal Regarding Recovery Of Carrier Specific Costs Related To The Missouri State Number Pooling Trials requesting an extension of time to June 28, 2002, to file its proposal.

3. Pursuant to Commission Regulation 4 CSR 240-2.080(16), responses to these pleadings are due not later than April 1, 2002, unless otherwise ordered by the Commission.

7/97

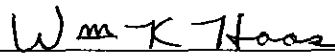
Pursuant to Commission Regulation 4 CSR 240-2.050(3), the Commission may, at its discretion, extend this deadline.

4. Although the industry did not submit a proposal for recovery of carrier specific costs, the Staff proposes to submit, no later than April 22, a report addressing cost recovery mechanisms. The Staff proposes to respond to Sprint's and SWBT's pleadings in that report.

WHEREFORE, the Staff requests the Commission to extend to April 22, 2002, the deadline for the Staff to respond to Sprint's and SWBT's pleadings.

Respectfully submitted,

DANA K. JOYCE
General Counsel



William K. Haas
Deputy General Counsel
Missouri Bar No. 28701

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-7510 (Telephone)
(573) 751-9285 (Fax)
e-mail: whaas01@mail.state.mo.us

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 1st day of April 2002.

Wm K Haas

Service List for
Case No. TO-2000-374
Revised: April 1, 2002 (SW)

Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

Lee S. Adams/Cheryl Tritt/Kimberly Wheeler
Morrison & Foerster, LLP
2000 Pennsylvania Ave., NW Ste. 5500
Washington, D.C. 20006

James F. Mauze/Thomas E. Pulliam
Ottsen, Mauze, Leggat & Belz, L.C.
Midvale Building
112 South Hanley
St. Louis, MO 63105-3418

Craig S. Johnson
Andereck, Evans, Milne, Peace & Baumhoer
301 E. McCarty Street
P.O. Box 1438
Jefferson City, MO 65102

James M. Fischer/Larry W. Dority
Fischer & Dority, P.C.
101 Madison Street, Suite 400
Jefferson City, MO 65101

Paul G. Lane/Leo J. Bub/
Anthony Conroy/Mimi B. MacDonald
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101-1976

Lisa Creighton Hendricks
Sprint – Legal and External Affairs
6450 Sprint Parkway
MS: KSOPHN0212-2A253
Overland Park, KS 66251

Rebecca B. DeCook
1875 Lawrence Street, Ste. 1575
Denver, CO 80202

J. Steve Weber
AT&T Communications of the Southwest
101 W. McCarty, Ste. 216
Jefferson City, MO 65101

Kevin K. Zarling
AT&T Communications
919 Congress, Suite 900
Austin, TX 78701

Peter Mirakian, III/Wendy E. DeBoer
Spencer, Fane, Britt & Browne, LLP
1000 Walnut Street, Suite 1400
Kansas City, MO 64106

Carl J. Lumley/Leland B. Curtis
Curtis, Oetting, Heinz, Garrett & Soule
130 S. Bemiston, Suite 200
Clayton, MO 63105

Edward J. Cadieux/Carol Keith
Gabriel Communications, Inc.
16090 Swingley Ridge Road
Chesterfield, MO 63006

Mark W. Comley
Newman, Comley & Ruth, P.C.
601 Monroe Street, Suite 301
Jefferson City, MO 65101

W. R. England, III
Brydon, Swearengen & England P.C.
312 E. Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456

Martin C. Rothfelder
The Rothfelder Law Offices
625 Central Avenue
Westfield, NJ 07090

James Rohfling
Brasil & Rohfling
6390 Lindell Blvd.
St. Louis, MO 63108