

ROBERT L. HAWKINS, JR.
DAVID V.G. BRYDON
JAMES C. SWEARENGEN
WILLIAM R. ENGLAND, III
JOHNNY K. RICHARDSON
STEPHEN G. NEWMAN
MARK W. COMLEY
GARY W. DUFFY
VICKI J. GOLDAMMER
PAUL A. BOUDREAU
BARRY V. CUNDIFF
ELLEN M. EDWARDS

LAW OFFICES
HAWKINS, BRYDON & SWEARENGEN
PROFESSIONAL CORPORATION
312 EAST CAPITOL AVENUE
P. O. BOX 456
JEFFERSON CITY, MISSOURI 65102-0456

AREA CODE 314
TELEPHONE 633-7165
TELECOPIER 634-7431

March 9, 1987

FILED

MAR - 9 1987

PUBLIC SERVICE COMMISSION

Hogarty
Mr. Harvey G. Hubbs
Secretary
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Case No. AO-87-48 ✓
Tax Reform Act of 1986

Dear Mr. Hubbs:

On behalf of Fidelity Telephone Company I enclose an original and fourteen (14) copies of a Motion for Extension of Time to File Second Response for filing in connection with the above-referenced matter. Would you please see that this is brought to the attention of the appropriate Commission personnel. I have caused two copies of same to be served on the Office of the Public Counsel this date.

Thank you for your assistance with this matter.

Sincerely,

HAWKINS, BRYDON & SWEARENGEN P. C.

By:

P.A. Boudreau
Paul A. Boudreau

PAB:sw
Enclosures

cc: Office of the Public Counsel

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PUBLIC SERVICE COMMISSION

H.D.

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

In the matter of the investigation)
of the revenue effects upon Missouri) Case No. A0-87-48
utilities of the Tax Reform Act of)
1986.)

MOTION FOR EXTENSION OF TIME TO FILE SECOND RESPONSE

Comes now Fidelity Telephone Company (Fidelity) and for its Motion for Extension of Time in which to file its second response to the Commission's Order Establishing Docket in the above-referenced matter and states as follows:

1. That on November 3, 1986, this Commission issued an Order Establishing Docket A0-87-48 for the purpose of investigating the effects of the Tax Reform Act of 1986 upon revenue requirement of certain Missouri public utilities.

2. That in said November 3, 1986, order, the Commission established a date of February 28, 1987, for the filing of a report to the Commission of the revenue requirement impact of the Federal tax changes on Fidelity's 1986 Missouri jurisdictional operations.

3. That the filing deadline was thereafter postponed to March 2, 1986.

4. That Fidelity hereby requests that it be granted an extension of time to April 30, 1987, in which to respond to the Commission's order. This extension of time is requested because

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Fidelity did not receive the requisite information from the Missouri IntraLATA Toll Pool (the "Pool") for purposes of determining its 1986 revenues in time to comply with the March 2, 1986, filing deadline. Furthermore, the press of other company activities including, but not limited to, participation in the development of the Conceptual Framework Missouri Intrastate IntraLATA Primary Carrier by Toll Center Plan (Case No. TO-84-222 et al.) have been such that Fidelity has not been able to allocate the resources necessary to generate a full and complete response to the Commission's order in a timely manner. Fidelity has since received a 1986 reconciliation from the Pool and is actively engaged in preparing its response.

WHEREFORE, Fidelity, for good cause shown, requests that the Commission grant its motion to extend the time in which its second response to the Commission's order is due in the above docket to April 30, 1987.

Respectfully submitted,



Paul A. Boudreau #33155
HAWKINS, BRYDON & SWEARENGEN P. C.
312 East Capitol Avenue
P. O. Box 456
Jefferson City, Missouri 65102-0456
(314) 635-7166

Attorneys for Fidelity Telephone
Company

Certificate of Service

I hereby certify that on this 9th day of March, 1987, I mailed postage prepaid or hand-delivered a true and correct copy of the above and foregoing to all parties of record this same date.



Paul A. Boudreau