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January 27, 1998

Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65101

FILED
JAN 27 1998
MISSOURI
PUBLIC SERVICE COMMISSION

Re: Case Number TO-98-115

Dear Judge Roberts:

Attached for filing with the Commission is the original and fifteen (15) copies of AT&T Communications of the Southwest, Inc.'s Agreed Motion for Extension of Time to File Interconnection Agreement in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

LATHROP & GAGE, L.C.

By: 
Paul S. DeFord

Cc: Diana J. Harter, SWB
Michael Dandino, Office of Public Counsel

FILED

JAN 27 1998

MISSOURI
PUBLIC SERVICE COMMISSION

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

In the Matter of AT&T Communications of the)
Southwest, Inc.'s Petition for Second Compulsory)
Arbitration Pursuant to Section 252(b) of the) **CASE NO. TO-98-115**
Telecommunications Act of 1996 to Establish an)
Interconnection Agreement with Southwestern Bell)
Telephone Company)

**AGREED MOTION FOR EXTENSION OF TIME
TO FILE INTERCONNECTION AGREEMENT**

AT&T Communications of the Southwest, Inc. (AT&T) submits this Agreed Motion for Extension of the February 1, 1998 deadline to submit an Interconnection Agreement, and in support thereof respectfully states:

I. BACKGROUND

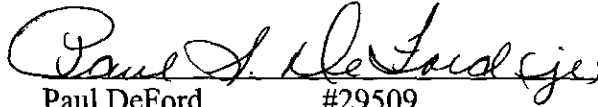
On December 23, 1997, the Missouri Public Service Commission (MoPSC or Commission) issued its Report and Order in the above-referenced proceeding. Pursuant to the Report and Order, on February 1, 1998, AT&T and Southwestern Bell Telephone Company (SWBT) are required to file an interconnection agreement implementing the language the parties have agreed to and the language adopted by the MoPSC in the Report and Order. The purpose of this motion is to request approximately a one month extension of time for the parties to comply with the Commission's Report and Order. AT&T has consulted with Michael Dandino of the Office of Public Counsel, and with counsel for SWBT, Ms. Diana J. Harter, and AT&T has been authorized to represent that Public Counsel and SWBT concurs with this motion.

Both SWBT and AT&T have worked diligently to comply with the Commission's December 23, 1997 Report and Order. However, the scope of the Report and Order makes clear that what is involved is not merely a minor contract amendment. In addition, despite their best efforts, the parties' resources have not been able to accommodate the Report and Order's deadline. In a number of instances the subject matter experts required to complete work on the parties' Missouri Interconnection Agreement have been unavailable as a result of their obligations in other state arbitration proceedings. Therefore, the reason for this extension is not merely for delay or as a result of disputes between the parties, but is based upon a realistic estimate of the amount of work to be done.

II. REQUEST FOR RELIEF

The parties request a reasonable extension of time to complete an Interconnection Agreement. The parties would propose that they be granted an extension until March 4, 1998 in order to file an Interconnection Agreement which is compliant with this Commission's December 23, 1997 Report and Order.

WHEREFORE, PREMISES CONSIDERED, AT&T requests that the relief described in the preceding paragraph, and agreed to by the parties, be granted and that such other and further relief as to which the parties show themselves entitled be granted.



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THE SOUTHWEST, INC.**