

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

In the Matter of an Investigation of the Actual                    )  
Costs Incurred in Providing Exchange Access                    )  
Service and the Access Rates to be Charged by                    )  
Competitive Local Exchange Telecommunications                    )  
Companies in the State of Missouri.                                    )  
Case No. TR-2001-65

**MOTION FOR LEAVE TO FILE COST STUDIES OUT OF TIME  
AND WAIVER OF COMMISSION RULE 4 CSR 240-2.085**

In support of this Motion for Leave to File Cost Studies Out of Time and Motion for Waiver of Commission Rule 4 CSR 240-2.085, filed pursuant to 4 CSR 240-2.015, the undersigned state to the Commission as follows:

**MOTION TO FILE OUT OF TIME**

1. Due to the complex and voluminous nature of the cost studies, as well as the practical and logistical difficulties of coordinating, combining, and copying the cost studies for twenty-four (24) different companies that employ several different consultants, the undersigned were unable to file the cost studies by the July 1, 2002 deadline.

2. The cost studies and Mr. Robert Schoonmaker's Schedule RCS-8 (which contains summary data from the cost studies) are being filed one day late – on July 2, 2002 – along with this Motion. This one day delay should not result in prejudice to any party.

**MOTION FOR WAIVER OF COMMISSION RULE 4 CSR 240-2.085**

3. Due to the voluminous nature of the cost studies, which total almost nine hundred (900) pages, the undersigned request a waiver of Commission Rule 4 CSR 240-2.085 which requires the filing of eight (8) additional copies.

WHEREFORE, the undersigned respectfully request that the Commission: (1) grant this Motion for Leave to File Cost Studies and Schedule RCS-8 Out of Time; (2) grant this Motion for Waiver of Commission Rule 4 CSR 240-2.085; and (3) grant such other relief as the Commission may find reasonable in the circumstances.

Respectfully submitted,



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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was mailed or hand-delivered, this 2<sup>nd</sup> day of July, 2002 to:

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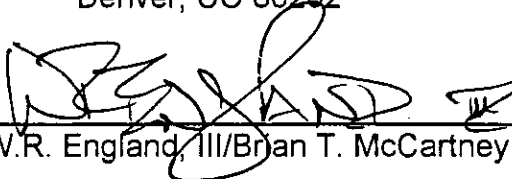
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