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March 23, 2000

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Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

FILED²

MAR 23 2000

Missouri Public
Service Commission

RE: TO-99-593

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a **MOTION FOR ORDER EXTENDING DATE FOR FILING A PROPOSED PROCEDURAL SCHEDULE.**

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,

Keith R. Krueger
Deputy General Counsel
(573) 751-4140
(573) 751-9285 (Fax)

KK/jb
Enclosure
cc: Counsel of Record

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 23 2000

Missouri Public
Service Commission

In the Matter of the Investigation into)
Signaling Protocols, Call Records,)
Trunking Arrangements, and Traffic)
Measurement.)

Case No. TO-99-593

MOTION FOR ORDER EXTENDING DATE
FOR FILING A PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), and for its Motion for Order Extending Date for Filing A Proposed Procedural Schedule, states to the Missouri Public Service Commission ("Commission") as follows:

1. The Commission created this case by order dated June 15, 1999. The Commission subsequently granted intervention in this case to Southwestern Bell Telephone Company, the Mid-Missouri Group, Sprint Missouri, Inc., Sprint Communications Company, L.P., the Small Telephone Company Group, Fidelity Telephone Company, GTE Midwest Incorporated, AT&T Communications of the Southwest, Inc., TCG St. Louis, Inc., TCG Kansas City, Inc., and Birch Telecom of Missouri, Inc.

2. At an early prehearing conference, held on September 21, 1999, the regulatory law judge encouraged the parties to try to resolve the issues in the case through negotiation in workshops or technical conferences.

3. The parties participated in one workshop to try to identify the issues in dispute, and to resolve them, on January 19, 2000, and then a second workshop on February 22, 2000. During these workshops, the parties agreed to conduct sample tests, in order to identify any problems that may currently exist in recording information about the origination and termination

of telephone calls. The parties subsequently participated in a conference call on March 8, 2000, for the purpose of identifying the small telephone companies to use for the agreed-upon "one-hour" sample tests, to finalize the process for testing (i.e. dates, notification letter to CLECs, etc.), and to discuss a nondisclosure agreement.

4. The parties will meet again by conference telephone call on March 28, 2000, to make additional arrangements for the one-hour sample test, to agree upon the technical documentation to be obtained from the one-hour sample test, and to seek to obtain data needed from the CLECs in connection with the sample test.

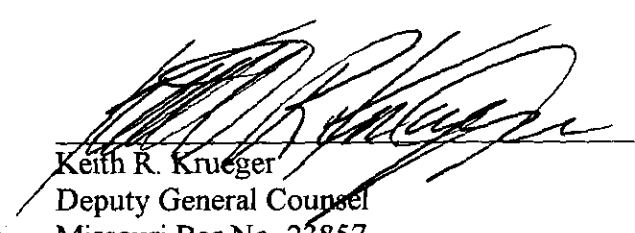
5. The parties are still completing the required technical conferences and setting up the calling tests. It is therefore not appropriate to attempt at this time to establish a procedural schedule for this case. The parties therefore requested that Staff seek an order from the Commission to extend by six months the date by which they must propose a procedural schedule, so that the procedural schedule is not established until the parties have collected the data that they need to collect in order to adequately present this case to the Commission for decision.

6. To the best of the Staff's knowledge, all other parties to this case agree with Staff's request that the deadline for filing the procedural schedule should be extended by six months.

WHEREFORE, the Staff requests that the Commission modify its order to postpone the time for filing a procedural schedule until September 22, 2000.

Respectfully submitted,

DANA K. JOYCE
General Counsel



Keith R. Krueger
Deputy General Counsel
Missouri Bar No. 23857

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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 22nd day of March 2000.



**Service List for
Case No. TO-99-593
March 23, 2000**

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