

NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

MONROE BLUFF EXECUTIVE CENTER

601 MONROE STREET, SUITE 301

P. O. BOX 537

JEFFERSON CITY, MISSOURI 65102-0537

TELEPHONE: (573) 634-2266

FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD
MARK W. COMLEY
CATHLEEN A. MARTIN
STEPHEN G. NEWMAN
JOHN A. RUTH
D. GREGORY STONEBARGER

April 10, 2000

The Honorable Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

FILED

APR 10 2000

Missouri Public
Service Commission

Re: Qwest Communications Corporation
Case No. TA-2000-309

Dear Judge Roberts:

Please find enclosed for filing the original and fourteen copies of a Motion for Extension of Time to File Response to Staff Supplemental Suggestions.

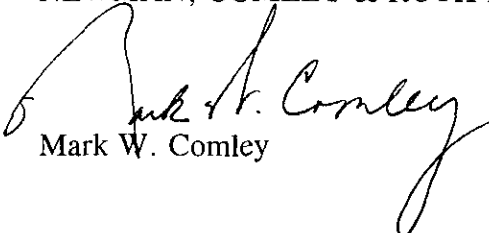
Please bring this filing to the attention of the appropriate Commission personnel.

Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
Leo J. Bub
William K. Haas
John Wenzel

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

FILED

APR 10 2000

Missouri Public
Service Commission

In the matter of the Application of)
QWEST COMMUNICATIONS CORPORATION)
for a Certificate of Authority)
to Provide Basic Exchange and Local Exchange) Case No. TA-2000-309
Intrastate Telecommunications Services within)
the State of Missouri.)

MOTION FOR EXTENSION OF TIME TO FILE
RESPONSE TO STAFF'S SUPPLEMENTAL SUGGESTIONS

Comes now Qwest Communications Corporation (hereinafter "Qwest" or "Company") and for its above entitled motion states the following to the Commission:

1. Pursuant to the Commission's March 29, 2000 Order Directing Filing, the Staff, on April 5, 2000, timely filed supplemental suggestions regarding Qwest's application for a certificate of authority to provide basic local and local exchange telecommunications services. In accord with the Commission's order, Qwest's response to Staff's Supplemental Suggestions is due today, April 10, 2000.

2. In its suggestions, Staff referred to Qwest's anti-slamming compliance plan which has been filed for FCC review in File No. ENF-99-11. As part of that compliance plan, Qwest listed several anti-slamming steps it would implement in addition to those already underway. One of the additional steps was the engagement of an independent auditor to examine annually, for two years, the Company's reporting and data tracking mechanisms and the enforcement procedures based upon those reports. Under the terms of the compliance plan, the auditor's opinion was to be delivered to the Qwest Board of Directors only.

3. In Paragraph 2 of its Supplemental Suggestions, Staff recommends approval of Qwest's application "with the condition that Qwest shall submit to the Staff any independent audit

reports prepared pursuant to the FCC compliance plan.”

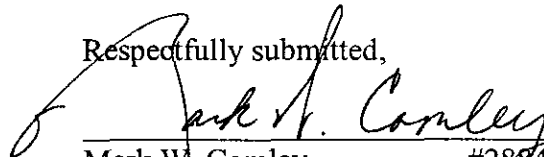
4. Qwest is generally encouraged by the Staff’s Supplemental Suggestions and its apparent concurrence in Qwest’s belief and position that the Company has taken positive steps to address and eliminate slamming concerns. However, Qwest needs additional time to consider the condition Staff seeks to impose on the approval of Qwest’s present application. Qwest has not proposed to disclose the contents of the independent auditor’s report with any entity except its own Board of Directors. Staff’s proposal would mean a modification to Company’s plan, and additional time is needed by the Company to adequately consider Staff’s proposal.

5. Furthermore, Qwest intends to file prepared testimony as part of its response to the Staff’s Supplemental Suggestions, and as additional support for its application before the Commission.

6. For the foregoing purposes, Qwest needs an additional 30 days within which to respond to the Staff’s Supplemental Suggestions.

WHEREFORE, Qwest respectfully requests that the Commission extend the time for it to respond to the Staff’s Supplemental Suggestions by 30 days, up to and including, May 10, 2000, together with such other relief the Commission deems just under the circumstances.

Respectfully submitted,



Mark W. Comley #28847
Newman, Comley & Ruth P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537

Attorneys for QWEST COMMUNICATIONS
CORPORATION

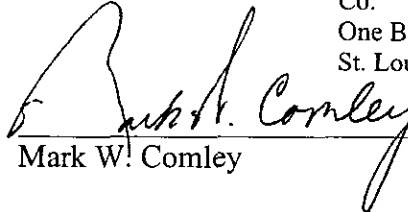
Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, on this 10th day of April, 2000, to:

Michael F. Dandino
Senior Public Counsel
Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

William K. Haas
Assistant General Counsel
P.O. Box 360
Jefferson City, MO 65102

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


Mark W. Comley