BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Staff's Review of the Commission's Chapter 31 Rules))	File No.TW-2017-0078
In the Matter of Staff's Review of the Commission's Chapter 28 Rules))	File No.TW-2018-0098

MOTION FOR EXTENSION OF TIME

COMES NOW the Missouri Cable Telecommunications Association ("MCTA"), and for its Motion for Extension of Time, respectfully states as follows:

 On October 17, 2017, the Staff of the Missouri Public Service Commission ("Staff") filed its Request for Comments in File No. TW-2017-0078, and "Staff Motion to Open New Docket and Request for Comments" initiating File No. TW-2018-0098.
As reflected in those pleadings, these dockets address proposed changes to Commission Rules 4 CSR 240 Chapter 31 and 4 CSR 240 Chapters 28 and 37, respectively. Staff further notes that pursuant to the Governor's Executive Order 17-03, state agencies have been asked to review their currently effective rules and propose changes to make the rules more efficient and effective.

2. The Staff attaches its proposed changes to the above-referenced rules as "Attachment A" to each pleading. As noted in each Attachment A, the proposed changes rescind, replace, streamline and establish new provisions in these important rules impacting the telecommunications industry.

In both of its pleadings, Staff "asks all interested parties to review its proposed changes and submit any comments and suggestions no later than October 23, 2017" – a time-frame of four (4) business days.

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4. On October 18, the Commission issued an Order regarding Staff's review of its Chapter 28 and 37 Rulemakings and directing "[a]ny stakeholder wishing to file comments regarding the rule changes proposed by Staff shall do so no later than October 23, 2017."

5. On October 18, the Missouri Small Telephone Company Group (STCG) and Missouri Independent Telephone Company Group (MITG) (hereinafter collectively referred to as the STCG), AT&T, CenturyLink, Windstream Missouri, LLC and FairPoint Communications Missouri, Inc. d/b/a FairPoint Communications (collectively "Joint Movants") filed a motion for extension of time, requesting at least an additional thirty (30) days to provide comments.

6. In that Motion, the Joint Movants assert that "While the Staff notes that, in the Chapter 31 review docket, it has 'held a workshop and received follow-up comments from interested parties as to the proposed changes,' the proposed changes set forth in both attachments are substantial and many have not been discussed with the industry. As a practical matter, the Joint Movants cannot review and offer substantive comments in the Staff's proposed time-frame, and respectfully request at least thirty (30) days for review and the submission of comments and suggestions."

7. MCTA agrees with the Joint Movants that four business days is not enough time to perform an adequate review and provide any meaningful comments to Staff's proposal, and respectfully joins in the request for at least thirty (30) additional days to file comments responding to Staff's proposal.

8. This Motion is not filed for purposes of delay or to impede the Commission's actions in accordance with the above-referenced Executive Order.

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WHEREFORE, MCTA respectfully requests at least thirty days to review the

Staff's proposed changes and to submit any comments and suggestions in the above-

captioned matters.

Respectfully submitted,

MISSOURI CABLE TELECOMMUNICATIONS ASSOCIATION

A, B.Bht

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 19th day of October, 2017.

A, B.Bht