

ORIGINAL

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June 15, 2000

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P.O. Box 360
Jefferson City, Missouri 65102

Re:

Allegiance Telecom of Missouri, Inc.

1999 Annual Reports

FILED

JUN 1 5 2000 -

Missouri Public Service Commission

TE-2000-822

Dear Mr. Roberts:

Please find enclosed for filing an original and eight (8) copies of Motion For Extension Of Time To File 1999 Annual Reports and one original each of the 1999 Annual Report (ABLEC and IXC), filed on behalf Allegiance Telecom of Missouri, Inc. Copies of the Motion have been sent this date to the General Counsel's Office and the Office of the Public Counsel. Thank you.

Sincerely,

Brent Stewart

CBS/bt

**Enclosure** 

cc:

General Counsel's Office Office of the Public Counsel Mark Lammert (TMI)

FILED<sup>2</sup>

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

JUN 1 5 2000

In the Matter of the filing of Allegiance	`	Service Commission
in the wratter of the fifting of Affegiance	,	15.0
Telecom of Missouri, Inc.'s 1999 Annual	)	Case No. 16.2000-822
Reports.	)	

## MOTION FOR EXTENSION OF TIME TO FILE 1999 ANNUAL REPORTS

Comes now Allegiance Telecom of Missouri, Inc. ("Allegiance" or "the Company"), a certificated interexchange and competitive (alternative) local exchange company, by and through counsel and pursuant to 4 CSR 240-10.080 and 4 CSR 240-2.015, and for its Motion For Extension Of Time To File 1999 Annual Report respectfully states as follows:

- 1. A few days after April 15, 2000, Allegiance attempted to file its 1999 verified Annual Reports with the Commission, one for its Interexchange and one for its Competitive Basic Local Exchange operations. Said Annual Reports were not actually received by the Commission until after the April 15, 2000 deadline mandated by 4 CSR 240-10.080(1) and Section 392.210 RSMo 1994. As such, said Annual Reports were rejected for filing and returned to the Company with instructions to re-file same along with a pleading, signed by counsel, requesting an extension.
- 2. It is unclear to counsel exactly why said Annual Reports were not received by the Commission by the April 15, 2000 deadline, but it was either because of delays in the United States Mail or because of inadvertent internal difficulties within the Company in meeting the filing deadline. In either case, it was not the Company's intent to ignore the Commission's rule and the Company seeks to remedy the situation with this filing.
  - 3. Upon receipt of the Commission's notification that it had rejected the filing, the

Company through its consultant service sought and then employed counsel for the purpose of re-submitting the Company's Annual Reports as quickly as possible. Due to scheduled hearings and other caseload commitments, counsel was unable to make this filing until this time.

4. 4 CSR 240-10.080(8) and 4 CSR 240-2.015 (to the extent applicable) allows a utility to request an extension of time within which to file the utility's annual reports provided the reasons therefore are stated. Counsel has attempted to do so based on the information available to him and has included with this pleading one original of the Company's 1999 Annual Reports (one for IXC and one for CLEC) for filing in the interest of providing the Commission with the Company's 1999 Annual Reports as quickly as possible.

WHEREFORE, Allegiance Telecom of Missouri, Inc. respectfully moves the Commission to grant this Motion For Extension Of Time To File 1999 Annual Reports and to accept as now submitted for filing the Company's 1999 Annual Reports under the applicable Commission rules.

Charles Brent Stewart, MoBar#34885 STEWART & KEEVIL, L.L.C. 1001 Cherry Street, Suite 302 Columbia, Missouri 65201 (573) 499-0635 ATTORNEY FOR ALLEGIANCE TELECOM OF MISSOURI, INC.

## CERTIFICATE OF SERVICE

The undersigned certifies that the original 1999 Annual Reports of Allegiance Telecom of Missouri, Inc. were submitted this date to the Commission's Records Department, and that a true copy of the foregoing Motion was sent this date to the General Counsel's Office and the Office of the Public Counsel by hand-delivery, this 15th day of June, 2000.