

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the matter of the cancellation of)
the registration of DIECA Communications) Case No. DD-2010-0029
Inc. d/b/a Covad Communications)
Company to provide Interconnected)
Voice Over Internet Protocol Service.)
)

Motion for Additional Time

COMES NOW DIECA Communications, Inc. d/b/a Covad Communications Company (Covad), pursuant to 4 CSR 240-2.050 and 2.080(15) and for its Motion for Additional Time states:

1. Covad has learned of the filing of Staff's Motion to Cancel VOIP Registration through routine examination of filings made at the Commission. The undersigned counsel is currently unaware of whether the mailed service copy has in fact been received.

2. Covad is not certain of the specific procedures that the Commission intends to follow in this case (i.e. whether formal notice will issue or not) and as a result is unsure as to when its response to the Motion to Cancel will be due.

3. On the premise that a response might be due as soon as July 26, 2009 (ten days after filing) under 4 CSR 240-2.080(15), Covad hereby requests additional time to and including August 7, 2009 in which to respond.

4. In-house counsel for Covad with responsibility for this matter is currently not available to provide necessary assistance to the undersigned counsel regarding preparation of the response to the Motion to Cancel, and additional time is required so that a complete response can be prepared and submitted.

5. Covad opposes the Motion to Cancel and believes that it was filed based on a misunderstanding of the FCC pleadings and notices referenced therein. Covad will provide a full explanation in its response, demonstrating that the Motion to Cancel should be withdrawn or denied.

WHEREFORE, Covad moves the Commission to grant it leave to file its response to Staff's Motion to Cancel by August 7, 2009.

Respectfully submitted,

CURTIS, HEINZ,
GARRETT & O'KEEFE, P.C.

/s/ Carl J. Lumley

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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was either mailed, faxed, or emailed this 21st day of July, 2009, to the persons listed on the attached service list.

/s/ Carl J. Lumley

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