

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

In the Matter of the Cancellation of the Certificate of )  
Service Authority of Velocity The Greatest Phone ) **File No. XD-2012-0160**  
Company Ever, Inc., to Provide Competitive Interexchange )  
Telecommunications Services in the State of Missouri )

In the Matter of the Cancellation of the Certificate of )  
Service Authority of Velocity The Greatest Phone )  
Company Ever, Inc., to Provide Competitive Resold and ) **File No. CD-2012-0161**  
Facilities-Based/UNE Basic Local Telecommunications )  
Services in Portions of the State of Missouri )

**STAFF'S MOTIONS FOR EXTENSION OF TIME TO FILE RESPONSES**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and on its behalf, and that of Velocity The Greatest Phone Company Ever, Inc., (Velocity or Company) moves for the Missouri Public Service Commission (Commission) to extend the filing of responses in the above matters for an additional thirty days. In support thereof, the Staff states as follows:

1. On November 23, 2011, the Staff requested the cancellation of Velocity's certificates of service authority and associated tariffs to provide intrastate interexchange and basic local exchange telecommunication services in the state of Missouri.

2. On November 29, 2011, the Commission filed an *Order Directing Notice (Order)* in each case, directing any party to file responses to the Staff's motions for cancellation by December 9, 2011.

3. After discussions on both December 5 and 9, 2011, the Company advised the undersigned that it wished to correct the deficiencies with the Commission and with the Missouri Secretary of State, as alleged in the Staff's November 23, 2011 motions. The Staff and the Company agree to recommend to the Commission that it extend the filing of responses in the

above matters for an additional thirty days to allow the Company to correct its deficiencies so that it can legally operate within the state. Should the Company correct all deficiencies, the Staff anticipates filing dismissals in each matter.

**WHEREFORE**, the Staff requests that the Commission extend the time for the filing of responses in the above matters until January 9, 2012, to allow the Company to correct its deficiencies with the Commission and the Missouri Secretary of State.

Respectfully submitted,

**/s/Jennifer Hernandez**

Jennifer Hernandez  
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Missouri Bar No. 59814

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Missouri Public Service Commission  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have provided a true and correct copy of the above pleading by prepaid First Class United States Postal Mail or electronic mail to: Velocity The Greatest Phone Company Ever, Inc., Attn: Judi Reed, 7130 Spring Meadows West Drive, Holland, OH 43528; Velocity The Greatest Phone Company Ever, Inc., c/o Registered Agent, Missouri Secretary of State, 600 West Main, Jefferson City, MO 65102; and the Office of the Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) this 9<sup>th</sup> day of December 2011.

**/s/Jennifer Hernandez**