

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

**In the matter of the Joint Application of Cass )  
County Telephone Company, Limited )  
Partnership, LEC Long Distance, Inc. )  
d/b/a CassTel Long Distance, FairPoint )  
Communications, Inc., FairPoint )  
Communications Missouri, Inc. d/b/a )  
FairPoint Communications and ST Long )  
Long Distance, Inc. d/b/a FairPoint )  
Communications Long Distance for authority )  
to transfer and acquire Cass County Telephone )  
Company, Limited Partnership's and LEC )  
Long Distance, Inc.'s facilities or systems )  
located in the State of Missouri; 2) for issuance )  
of certificates of service authority to FairPoint )  
Communications Missouri, Inc. d/b/a FairPoint )  
Communications and ST Long Distance, Inc. )  
d/b/a FairPoint Communications Long Distance; )  
and 3) to designate FairPoint Communications )  
Missouri, Inc. d/b/a FairPoint Communications )  
as a telecommunications carrier eligible to )  
receive federal universal service support. )**

Case No. TM-2006-0306

**FAIRPOINT'S MOTION TO EXTEND FILING DATE  
OF STAFF RECOMMENDATION**

Come now FairPoint Communications, Inc., FairPoint Communications Missouri, Inc. d/b/a FairPoint Communications and ST Long Distance, Inc. d/b/a FairPoint Communications Long Distance (collectively "FairPoint"), pursuant to Missouri Public Service Commission ("Commission") Rules 4 CSR 240-2.080 and 2.050(3), and for their Motion to Extend Filing Date of Staff Recommendation respectfully state as follows:

1. By its *Order Directing Staff To File A Staff Recommendation* entered in this matter on March 15, 2006, the Commission ordered the Staff of the Commission

("Staff") to file a recommendation regarding the subject joint application no later than April 14, 2006.

2. FairPoint has had discussions with the Staff regarding preliminary draft positions of the Staff on certain areas to be addressed in its recommendation, and FairPoint believes that the opportunity to continue discussions and exchange additional information with the Staff will be helpful in addressing, and hopefully resolving, potential issues in this matter. FairPoint and the Staff agree that an extension of the current filing date for an additional seven (7) days, to April 21, 2006, is reasonable and appropriate.

3. Commission Rule 4 CSR 240-2.050(3) provides that the Commission may order a period enlarged before the expiration of that period if an act is required or allowed to be done by order of the Commission. FairPoint is authorized to state that none of the other parties to this proceeding (Joint Applicants "CassTel" and "CassTel LD," Staff and the Office of the Public Counsel) object to the relief requested herein.

WHEREFORE, FairPoint respectfully requests that the Commission extend the current date for the filing of the Staff Recommendation in this matter for an additional seven (7) days to April 21, 2006.

Respectfully submitted,

**/s/ Larry W. Dority**

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Larry W. Dority      MBN 25617  
FISCHER & DORITY, P.C.  
101 Madison Street, Suite 400  
Jefferson City, Missouri 65101  
Tel.: (573) 636-6758  
Fax: (573) 636-0383  
Email: [lwdority@sprintmail.com](mailto:lwdority@sprintmail.com)

Attorneys for FairPoint Communications, Inc.,  
FairPoint Communications Missouri, Inc. d/b/a  
FairPoint Communications and ST Long Distance,  
Inc. d/b/a FairPoint Communications Long Distance

#### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 14<sup>th</sup> day of April, 2006, a copy of the above and foregoing Motion was served via electronic mail to all parties of record.

**/s/ Larry W. Dority**

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Larry W. Dority