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February 25, 2000

**VIA HAND DELIVERY**

**FILED**

**FEB 25 2000**

Mr. Dale Roberts  
Executive Secretary  
Missouri Public Service Commission  
301 West High Street, Suite 530  
Jefferson City, Missouri 65101

**Missouri Public  
Service Commission**

Re: *In the Matter of the Petition of DIECA Communications, Inc. d/b/a Covad  
Communications Company for Arbitration of Interconnection Rates, Terms,  
Conditions and Related Arrangements With Southwestern Bell Telephone  
Company  
Case No. TO-2000-322*

Dear Mr. Roberts:

Enclosed for filing with the Commission is DIECA Communications, Inc. d/b/a Covad Communications Company's Motion for Additional Time to File Post-Hearing Brief. The original and 14 copies of this document will be forwarded by Federal Express for delivery on February 28, 2000.

Please do not hesitate to contact me if you should have any questions. Thank you for bringing this matter to the attention of the Commission.

Very truly yours,

*Lisa Creighton /cmw*  
Lisa C. Creighton

LCC/cmw  
Enclosures

cc: Office of Public Counsel  
Office of General Counsel

FILED

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION FEB 25 2000

IN THE MATTER OF THE PETITION OF )  
DIECA COMMUNICATIONS, INC. )  
D/B/A COVAD COMMUNICATIONS COMPANY )  
FOR ARBITRATION OF INTERCONNECTION )  
RATES, TERMS, CONDITIONS AND RELATED )  
ARRANGEMENTS WITH SOUTHWESTERN )  
BELL TELEPHONE COMPANY )

Missouri Public  
Service Commission

Case No. TO-2000-322

**DIECA COMMUNICATIONS, INC. D/B/A COVAD COMMUNICATIONS  
COMPANY'S MOTION FOR ADDITIONAL TIME TO FILE POST-HEARING BRIEF**

COMES NOW, DIECA Communications, Inc. d/b/a/ Covad Communications Company ("Covad") and in support of its Motion for Additional Time to File a Post-Hearing Brief states as follows:

1. On February 16, 2000, the hearing in this docket concluded. At that time, the Administrative Law Judge set Wednesday, March 1, 2000 at 12:00 p.m. as the date and time on which the post-hearing briefs are due by all parties.

2. On February 23, 2000, a hearing in the arbitration between Covad and Southwestern Bell Telephone Company ("SWBT") filed in Kansas began. The hearing concluded on February 24, 2000. The same Covad attorneys, Laura Izon and Christopher Goodpastor, who handled the Missouri hearing, also handled the Kansas hearing.

3. On February 25, 2000, Ms. Izon and Mr. Goodpastor are returning to their home offices in California and Houston respectively.

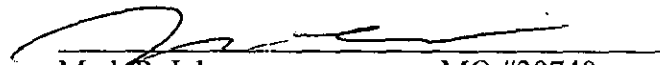
4. As a result of the back-to-back hearings and the travel times, the Covad attorneys (Ms. Izon and Mr. Goodpastor), who will be writing the post-hearing brief, will only have two business days before it is due in Jefferson City. Covad therefore, requests an additional day (plus a few hours) before which the parties must file their post-hearing Brief, or until Thursday March 2, 2000 at 3:00 p.m.<sup>1</sup>

5. If the request for an additional day is declined, Covad requests, in the alternative, a 3:00 p.m. filing time on March 1, 2000.

6. The other parties have been contacted and informed of Covad's request. Covad is awaiting a response from the parties as to whether they oppose this request.

WHEREFORE, DIECA Communications, Inc. d/b/a Covad Communications Company, respectfully requests the Commission grant an additional day before the parties must file their post-hearing briefs, as well as a filing time of 3:00 p.m. instead of 12:00 p.m.

Respectfully submitted,

  
Mark P. Johnson MO #30740  
Lisa C. Creighton MO #42194  
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(816) 531-7545 (facsimile)

ATTORNEYS FOR DIECACOMMUNICATIONS,  
INC. D/B/A COVAD COMMUNICATIONS  
COMPANY

<sup>1</sup> The request to change the filing time from 12:00 p.m. to 3:00 p.m. results from the fact that the brief will be leaving Sonnenschein's office in Kansas City. As the delivery service requests at least 3 hours, the 12:00 p.m. time would require that personnel be in the office by 6:30 a.m. and that personnel in California be available at 4:30 a.m..

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was transmitted via facsimile and Federal Express this 25<sup>th</sup> day of February, 2000, to:

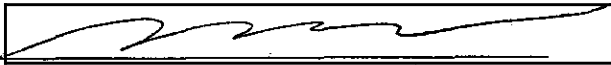
Paul Lane, Esq.  
Southwestern Bell Telephone  
One Bell Central, Room 3516  
St. Louis, Missouri 63101

Office of General Counsel  
ATTN: Bill Haas  
P. O. Box 360  
Jefferson City, Missouri 65102

With copies being mailed on the same date, postage prepaid, to:

Office of the Public Counsel  
P. O. Box 7800  
Jefferson City, Missouri 65102

Khristine A. Heisinger, Esq.  
Missouri Department of Economic Development  
301 West High Street, Room 680  
Jefferson City, Missouri 65102-1157



Attorney for DIECA Communications, Inc.  
d/b/a Covad Communications Company