

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

In the Matter of the Application of                                 )  
dPi Teleconnect, LLC for Designation as             )         File No. CO-2010-0054  
an Eligible Telecommunications Carrier             )

**MOTION TO STAY INSPECTION OF RECORDS**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and files this *Motion To Stay Inspection Of Records (Motion)*, to allow the Staff sufficient time to inspect records dPi Teleconnect, LLC (dPi or Company) submitted to the Staff on December 1, 2009. For this *Motion*, Staff respectfully states the following:

1.         On August 7, 2009, dPi filed an *Application For Designation As An Eligible Telecommunications Carrier (Application)*, requesting designation throughout certain AT&T Missouri service territories for the purpose of receiving federal universal service low income support.

2.         Beginning in August 2009, and throughout this case, the Staff has requested the Company provide responses to numerous data requests. Up until December 1, 2009, the Company had submitted very limited responses to Staff for only some of the requests.

3.         During the review of materials submitted by the Company prior to December 1, 2009, the Staff found discrepancies between the information provided and the Company's annual reports, which lead the Staff to further question the facilities owned and resale provided by the Company, and whether the Company has fully complied with the collection and funding requirements for the Missouri Universal Service and Relay Missouri Funds.

4. Due to the discrepancies, the Staff filed a motion for inspection of records on October 30, 2009, which the Commission granted on November 18, 2009. The Commission ordered the inspection for December 2, 2009.

5. From Staff's initial review of the Company's December 1, 2009 responses, Staff asserts the responses necessitate further inquiry. However, until the Staff thoroughly reviews the responses provided and the revised annual reports the Company intends to file on Friday, December 4, 2009, and due to the Company's current willingness to provide information to the Staff and correct any underfunding to the Missouri Universal Service and Relay Missouri Funds, an inspection of records at this point in time is duplicative of the Company's December 1, 2009 production.

**WHEREFORE**, the Staff respectfully requests that the Commission issue an order staying the inspection of records of dPi Teleconnect, LLC indefinitely until further motion by the Staff.

Respectfully submitted,

**/s/ Jennifer Hernandez**

Jennifer Hernandez

Legal Counsel

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Missouri Public Service Commission

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Mark P. Johnson, Sonnenschein Nath & Rosenthal LLP, Attorneys for dPi Teleconnect, LLC at [mjohnson@sonnenschein.com](mailto:mjohnson@sonnenschein.com); and The Office of Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) this 2<sup>nd</sup> day of December, 2009.

**/s/ Jennifer Hernandez**