

**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 FOR EXTENSION OF TIME TO FILE
STATUS REPORT**

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through the undersigned attorney, and moves for the Missouri Public Service Commission (Commission) to allow the Staff until October 30, 2009, to file a status report in this matter. For this *Motion*, Staff respectfully states the following:

1. On August 7, 2009, dPi Teleconnect, LLC (dPi or Company) 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. On August 10, 2009, the Commission's *Order Directing Filing* directed Staff to file a recommendation by September 9, 2009.

3. On September 9, 2009, the Staff filed a motion for an extension until September 23, 2009, to file a recommendation. On September 14, 2009, the Commission's *Order Granting Motion For Extension Of Time To File Staff Recommendation* granted Staff's motion.

4. Staff diligently investigated dPi's *Application*, however additional issues have arisen that warrant further discovery.

5. Counsel for dPi does not object to Staff's request.

WHEREFORE, the Staff respectfully requests the Commission allow until October 30, 2009 for Staff to file a status report in this matter.

Respectfully submitted,

/s/ Jennifer Hernandez

Jennifer Hernandez
Legal Counsel
Missouri Bar No. 59814

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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; and The Office of Public Counsel at opcservice@ded.mo.gov this 23rd day of September, 2009.

/s/ Jennifer Hernandez