

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

In the Matter of the Determination of Prices,)	
Terms, and Conditions of Certain Unbundled)	Case No. TO-2001-438
Network Elements.)	

**SOUTHWESTERN BELL TELEPHONE COMPANY'S
MOTION FOR EXTENSION OF TIME**

COMES NOW Southwestern Bell Telephone, L.P., d/b/a Southwestern Bell Telephone Company ("SWBT") and for its Motion for Extension of Time states as follows:

1. The Missouri Public Service Commission ("Commission") issued its Report and Order in this case on August 6, 2002. In that decision, the Commission resolved approximately 350 issues regarding various cost studies submitted by SWBT in this proceeding.
2. The Report and Order required SWBT to rerun its cost studies in compliance with the determinations made by the Commission in the Report and Order, with the results to be submitted by September 20, 2002. The Commission also determined that any party wishing to file a response to SWBT's revised cost studies was required to do so by November 4, 2002. No specific date was provided for SWBT's reply to responses to its September 20, 2002 filing, but the provisions of 4 CSR 240-2.080(16) would require a reply by November 14 unless otherwise ordered by the Commission.
3. On November 4, 2002, the Missouri Public Service Commission Staff ("Staff") filed its Report on Southwestern Bell Telephone Company's Compliance Filing ("Staff's Report"). Staff noted that it may make an additional or supplemental report after reviewing any additional information supplied by SWBT. AT&T Communications of the Southwest, Inc. ("AT&T"), MCImetro Access Transmission Services, LLC, Brooks Fiber Communications of

Missouri, Inc., MCI WorldCom Communications, Inc., Birch Telecom of Missouri, Inc., XO Missouri, Inc., NuVox Communications of Missouri, Inc., McLeodUSA Telecommunications, Inc., TCG Kansas City, Inc., and TCG St. Louis, Inc. (collectively “Joint Sponsors”) also filed a Response to Southwestern Bell’s Compliance Cost Study Results (“Joint Sponsors’ Response”) on November 4 2002.

4. The Joint Sponsors’ Response claimed that SWBT failed to comply or only partially complied with the Commission’s decision on 73 of the issues submitted for resolution in the proceeding. Staff also identifies several areas in which it contends either that SWBT did not comply or that it is not clear to Staff whether SWBT did comply with the Report and Order.

5. The voluminous issues raised by the Joint Sponsors and Staff will require substantial time to review and to prepare a reply. The contentions by the Joint Sponsors and Staff affect many of the cost studies at issue in this proceeding, and will require input from several different groups of cost study personnel. The additional time is necessary in order to ensure that the Commission has accurate and complete information when it considers SWBT’s revised cost studies and the issues raised by Joint Sponsors and Staff. SWBT also notes that the same cost study personnel which must evaluate and reply to Joint Sponsors’ Response and Staff’s Report are also involved in cost proceedings in Michigan, California, Texas and Illinois which further necessitates this request for additional time. SWBT cannot realistically prepare an appropriate response for the Commission’s consideration prior to November 22, 2002, or approximately eight days after a reply would otherwise be due.

6. Staff does not object to the proposed extension of time, provided that SWBT does not object to Staff receiving ten business days to respond to SWBT’s reply. SWBT does not object to Staff responding within ten business days.

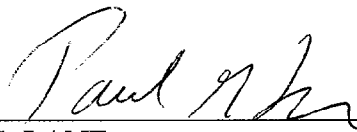
7. AT&T, TCG Kansas City, Inc. and TCG St. Louis, Inc. do not object to the proposed extension of time. Counsel for AT&T advises that the other parties comprising the Joint Sponsors group also do not object to the proposed extension of time.

WHEREFORE, for all the foregoing reasons, SWBT respectfully requests the Commission to grant its Motion for an Extension of Time until November 22, 2002, to respond to the Joint Sponsors' Response to Southwestern Bell's Compliance Cost Study Results and Staff's Report on SWBT's Compliance Filing until November 22, 2002.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing document were served to all parties by e-mail on November 7, 2002


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