

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

In the Matter of the Tariffs to Reduce Access	)	
Rates of Local Telecommunications Companies	)	
Pursuant to Federal Communications Commission	)	File No. TT-2012-0317
Report and Order FCC 11-61.	)	

**AT&T'S MOTION FOR EXTENSION OF TIME**

AT&T<sup>1</sup> respectfully requests a 15-day extension of time to comply with the rate and tariff filing requirements from the Commission's April 4, 2012 *Order Establishing Procedures for Consideration of Access Rate Tariffs*. In support of its Motion, AT&T states:

1. Background. In an Order issued April 4, 2012, the Commission established procedures for local exchange carriers to file tariff revisions to implement transitional intrastate access service rate changes required by a recently issued FCC Order.<sup>2</sup> Under the FCC Order, the first access rate reduction must occur by July 1, 2012. The Commission, in order to enable it to review these tariff filings in an orderly and efficient manner, directed carriers in Missouri to submit them at least 60 days in advance of the tariff effective date. In addition, the Commission directed carriers submitting these tariffs to simultaneously file supporting documentation.<sup>3</sup>

2. AT&T's Need for an Extension. AT&T and its affiliates operate as the incumbent local exchange company ("ILEC") in 22 states. The group within AT&T that has the expertise and is responsible for calculating the required Missouri access rate reductions and preparing the tariffs is also responsible for performing similar tasks in the other 21 AT&T ILEC states. The group is also responsible for the calculations in all 22 AT&T states of the Access Recovery Charge rate element, which was newly established by the FCC. In addition, the group has

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<sup>1</sup> Southwestern Bell Telephone Company, d/b/a AT&T Missouri will be referred to in this pleading as "AT&T."  
<sup>2</sup> *Connect America Fund et al.*, WC Docket No. 10-90 et al., *Report and Order and Further Notice of Proposed Rulemaking*, FCC 11-161 (rel. Nov. 18, 2011) ("*USF/ICC Transformation Order*"), *Pets. for review pending, Direct Commc'ns Cedar Valley, LLC vs. FCC*, No. 11-9581 (10<sup>th</sup> Cir. filed Dec. 18, 2011) (and consolidated cases).  
<sup>3</sup> *Order Establishing Procedures for Consideration of Access Rate Tariffs*, Case No. TT-2012-0317, issued April 4, 2012 at pp. 1-2.

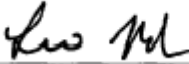
responsibilities associated with the preparation of the FCC annual access filing, which is currently being worked. Given the complexity and sheer volume of anticipated work that must be completed within this short timeframe, it will be extremely difficult for AT&T to meet the Commission's 60-day advanced filing requirement for the proposed rates and tariffs.

3. Granting this Short Extension should not Harm Other Parties. AT&T at this time will not be restructuring its intrastate switched access tariff rates to mirror the rate structure of its interstate switched access tariff. For the July 1, 2012, reduction mandated by the FCC, AT&T will simply be reducing existing intrastate switched access rate elements to achieve the required reductions. Making these reductions without an accompanying tariff restructure should make the review of AT&T's rate reductions much simpler. If this motion is granted, AT&T would still provide much of the supporting data sought by the Commission (current intrastate rates, intrastate demand, and current interstate rates) within the original timeframes of the Commission's Order.

WHEREFORE, AT&T respectfully requests the Commission to grant this motion and allow AT&T an additional 15 days to make the rate and tariff filings required by the Commission's April 4, 2012 *Order Establishing Procedures for Consideration of Access Rate Tariffs*.

Respectfully submitted,

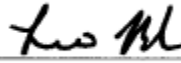
SOUTHWESTERN BELL TELEPHONE COMPANY,  
D/B/A AT&T MISSOURI

BY   
JEFFREY E. LEWIS #62389  
LEO J. BUB #34326  
ROBERT J. GRYZMALA #32454

Attorneys for AT&T  
909 Chestnut Street, Room 3518  
St. Louis, Missouri 63101  
314-235-2508 (Telephone)\314-247-0014(Facsimile)  
[leo.bub@att.com](mailto:leo.bub@att.com)

**CERTIFICATE OF SERVICE**

Copies of this document were served on the following parties by e-mail on April 20, 2012.



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Leo J. Bub

General Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[GenCounsel@psc.mo.gov](mailto:GenCounsel@psc.mo.gov)

Public Counsel  
Office of the Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)