BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Assurance Home)	
Phone Services, Inc., d/b/a Surety Wireless for)	File No. RA-2011-0298
Designation as an Eligible Telecommunications)	
Carrier on a Wireless Basis (Low Income Only))	

STAFF REQUEST FOR EXTENSION OF TIME

COMES Now the Staff of the Missouri Public Service Commission and for its recommendation, states as follows:

- 1. On March 23, 2011, Assurance Home Phone Services, Inc., d/b/a Surety Wireless ("the Company"), a wireless carrier, filed an application with the Missouri Public Service Commission seeking designation as an Eligible Telecommunications Carrier ("ETC") for the purpose of receiving federal universal service fund support for low income customers through Lifeline and LinkUp programs.
- 2. The Commission first ordered the Staff to file a recommendation on or before April 28, then granted it an extension until May 13, 2011.
- 3. The Staff is finding the review of wireless ETC requests to be much more intricate than in the past. As the Commission is aware, certain allegations concerning wireless ETCs have been brought to the Commission's and Staff's attention. Due to the interconnectedness of the wireless companies and their use of common contractors, the review of these applications has become much more time consuming than in the past. In addition, as the Commission knows, the Telecommunications Department has only six full-time staff members to handle all the telecommunications matters, including those with operation of law dates and other time-sensitive matters.

WHEREFORE, the Staff requests that the Commission grant the Staff an additional month to complete its review of the Company's Application, until June 13, 2011.

Respectfully submitted,

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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 12th day of May, 2011.