

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Southwestern Bell Telephone , L.P.)	
d/b/a SBC Missouri's Petition to Amend)	
the Section 251/252 Interconnection)	
Agreement between SBC Missouri)	
and Various Competitive Local Exchange)	
Carriers.)	Case No. TO-2005-0117
)	
Southwestern Bell Telephone, L.P.)	
d/b/a SBC Missouri,)	
)	
Petitioners,)	
)	
vs.)	
)	
1-800-RECONEX, Inc., et al.,)	
)	
Respondents.)	

**INTERMEDIA COMMUNICATIONS, INC.'S
MOTION FOR ADDITIONAL TIME TO RESPOND**

COMES NOW Intermedia Communications, Inc. ("Intermedia") pursuant to 4 CSR 240-2.050 and moves the Commission to grant it an additional thirty (30) days to respond to SBC's Amended Petition herein. In support of its request, Intermedia states to the Commission:

1. On November 23, 2004, the Commission issued notice to Intermedia that SBC had filed an Amended Petition asking the Commission to amend interconnection agreements between SBC and various CLECs including Intermedia. The Commission directed Intermedia and the other CLECs to respond to the Amended Petition by December 13, 2004.

2. In Case No. TM-2005-0129 the Commission has pending before it a proposed reorganization under which Intermedia would be merged into MCImetro Access Transmission Services, LLC. In the event that the proposed reorganization is approved and consummated, Intermedia would be merged into MCImetro and cease to exist.

3. In Case No. TO-2002-222 the Commission approved an interconnection agreement between SBC and MCImetro. That agreement remains in effect.

4. In the event that the proposed merger of Intermedia into MCImetro is approved and consummated, Intermedia understands that ongoing interconnection matters between SBC and MCImetro as successor to Intermedia would be governed by the existing SBC/MCImetro interconnection agreement. Accordingly, this proceeding to amend the interconnection agreement between SBC and Intermedia would become moot as to that particular agreement.

5. Intermedia currently expects that it will know whether the proposed reorganization will be approved and consummated no later than December 31, 2004.

6. Intermedia requests an additional thirty (30) days to respond to SBC's Amended Petition, so that its response can be based on the outcome of the currently proposed reorganization.

WHEREFORE, Intermedia Communications, Inc. requests that the Commission grant it an additional thirty (30) days to respond to SBC's Amended Petition.

CURTIS, HEINZ,
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CERTIFICATE OF SERVICE

A true and correct copy of the foregoing document was mailed this 13th day of December, 2004, by placing same in the U.S. Mail postage paid to:

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