

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

In the Matter of the Application of MCC Telephony)
of Missouri, Inc., for Waiver of Compliance with) Case No. TE-2006-0415
the Requirements of 4 CSR 240-32.)

**STAFF MOTION FOR EXTENSION OF TIME
TO FILE RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. MCC Telephony of Missouri, Inc., filed an application with the Commission requesting a waiver of compliance with the requirements of 4 CSR 240-32.080 (5) (A) 1 related to time standards for installation of service.

2. The Commission has directed the Staff to file its recommendation, or a request for additional time, by May 26, 2006.

3. Staff met with MCC Telephony and Sprint/Nextel officials to discuss MCC Telephony's Application for Waiver. Staff has also sent data requests to MCC Telephony to gather additional information. Staff requests a 4-week extension of the deadline to file its recommendation. This additional time will enable Staff to receive and review the additional information in the preparation of Staff's recommendation as well as provide further opportunity to meet with MCC Telephony officials. Staff needs this additional time to consider MCC Telephony's application as well as concerns raised by the Missouri Independent Telephone Group and the Office of the Public Counsel.

4. When an act is required to be done by order of the Commission at or within a specified time, the Commission, at its discretion, may order the period enlarged. 4 CSR 240-2.050(3).

WHEREFORE, the Staff requests a 4-week extension of time to June 23, 2006, to file its recommendation.

Respectfully submitted,

/s/ William K. Haas

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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 25th day of May 2006.

/s/ William K. Haas