

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

FullTel, Inc.,	)	
	)	
Complainant,	)	
	)	
v.	)	Case No. TC-2006-0068
	)	
CenturyTel of Missouri, LLC,	)	
	)	
Respondent.	)	
	)	

**STAFF’S MOTION FOR EXTENSION OF TIME  
TO FILE REPORT**

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

1. This case involves FullTel Inc.’s complaint that CenturyTel of Missouri, LLC, is in breach of the interconnection agreement between the two companies.
2. The Commission had directed the Staff to investigate and file a report in this matter by September 13, 2005.
3. Pursuant to Commission Rule 4 CSR 240-2.050 (3) (A), the Staff requests an extension until September 21, 2005, to complete its investigation and file a report. The Staff offers the following support for its request:
  - (a) This case involves complex issues of federal law and contract interpretation.
  - (b) The prehearing conference scheduled for September 16, 2005, will provide the opportunity for the Staff to have face-to-face discussions with the companies about the factual and legal issues in dispute.

(c) Allowing the Staff to file its report on September 21, 2005, should not unduly prejudice the companies' preparation for the hearing on September 28, 2005.

(d) CenturyTel of Missouri has filed a written request for voluntary negotiation, which if accepted, may ultimately obviate the need for either a Staff report or a hearing.

(e) Due to the press of other time-sensitive matters, including Sprint Missouri's request for competitive classification (Case No. IO-2006-0092) and SBC Missouri's requests for competitive classification (Case Nos. TO-2006-0093 and TO-2006-0102), the Staff has been unable to devote sufficient time to investigate and report on this matter.

WHEREFORE, the Staff requests an extension of time until September 21, 2005, to investigate and file a report in this matter.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/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 12<sup>th</sup> day of September 2005.

**/s/ William K. Haas**