BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Easy Telephone)	
Service Company for Designation as an Eligible Telecommunications Carrier in the)	File No. TA-2011-0164
State of Missouri)	
In the Matter of the Application of True)	
Wireless, L.L.C. for Designation as an Eligible)	File No. TA-2011-0265
Telecommunications Carrier Pursuant to)	
47 U.S.C. § 214(e))	
In the Matter of the Application of Global)	
Connection, Inc. of America d/b/a Stand Up)	File No. RA-2011-0299
Wireless for Designation as an Eligible)	
Telecommunications Carrier on a Wireless Basis)	
(Low Income Only))	
In the Matter of the Application of Assurance)	
Home Phone Services, Inc., d/b/a Surety)	File No. RA-2011-0298
Wireless for Designation as an Eligible)	
Telecommunications Carrier on a Wireless Basis)	
(Low Income Only))	
In the Matter of the Application of Aegis Telecom,)	
Inc. d/b/a Off the Hook Telecom for)	
Designation as an Eligible Telecommunications)	File No. RA-2011-0349
Carrier in the State of Missouri.)	
In the Matter of the Application of Assist)	
Wireless, L.L.C. for Designation as an Eligible	j	File No. RA-2011- 0384
Telecommunications Carrier in the)	
State of Missouri)	
In the Matter of the Application of i-wireless, LLC)	
for Designation as an Eligible Telecommunications)	File No. TA-2011-0377
Carrier in the State of Missouri)	

WITHDRAWAL OF STAFF MOTION AND REQUEST FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission and states as follows:

- 1. On June 2, 2011 the Staff filed a Motion for Indefinite Continuance on the first five above-referenced matters; substantively identical Motions were subsequently filed on the remaining matters. These were all applications, filed by wireless carriers, 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 Staff noted in its Motion that it was in receipt of material concerning assertions of fraud and other illegal activities by some wireless and some wireline ETCs, and was unable to conclusively ascertain whether any of the applicants engaged in such activities or were affiliated with any of the entities is an affiliate of any of the entities referred to in those materials.
- 3. Since the filing of the Motion, the Staff has developed a way to proceed with these applications, by issuing a standard set of Data Requests in advance of a rulemaking that will strengthen the application requirements. In light of the required time allowances for the issuing of Data Requests and their responses, the Staff anticipates that it will be able to file Recommendations within approximately two months, or no later than September 16, 2011.

WHEREFORE, the Staff withdraws its Motion for Indefinite Continuance and requests that the date on or before which the Staff Recommendations in the abovereferenced matters shall be filed be set at September 16, 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 July, 2011.