

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

In the Matter of Aptitude Internet, LLC)
Application for Designation as an)
Eligible Telecommunications Carrier)
for Purposes of Receiving Federal)
Universal Service Support)

Case No. TA-2021-0198

MOTION FOR EXTENSION

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Recommendation* in this matter hereby states:

1. On January 5, 2021, Aptitude Internet, LLC, (Company or Aptitude) filed a *Aptitude Internet, LLC Application for Designation as an Eligible Telecommunications Carrier for Purposes of Receiving Federal Universal Service Support* with the Commission requesting that the Commission issue an order granting the Company eligible telecommunications carrier (ETC) status for certain census blocks. The Company's request, if approved, would permit it to receive federal support pursuant to the Rural Digital Opportunity Fund (RDOF) auction held by the Federal Communications Commission (FCC). The Commission issued an *Order* on January 6, 2021, directing Staff to file its recommendation no later than February 5.

2. On January 21, 2021, several small telephone companies, collectively the Small Telephone Company Group, filed an *Application to Intervene* in which they also objected to Aptitude's filing for statewide ETC status. On January 25, 2021, the Commission issued a *Notice of Deficiency* citing to the Company's failure to have a Missouri-licensed attorney sign its *Application* or request leave pursuant to 20 CSR 4240-2.040.3(C). The Commission cited to 20 CSR 4240-2.116, stating that it

may dismiss the *Application* for lack of prosecution if the Company does not take action within 90 days of the Commission's *Order*.

3. Staff now petitions the Commission to suspend its provision requiring Staff to file its recommendation no later than February 5. To date the Company has not responded to the *Notice of Deficiency* or to the *Application to Intervene*. Staff asks the Commission to issue an order requiring Staff to file its recommendation within 21 days from the date Aptitude responds to the *Notice of Deficiency*. Staff will also address the *Application to Intervene* and any response the Company may file in its recommendation.

WHEREFORE, Staff asks that the Commission permit Staff to file its recommendation within 21 days from the date Aptitude Internet, LLC responds to the Commission's *Notice of Deficiency*; and that it grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

Whitney Payne

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Missouri Public Service Commission

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 2nd day of February, 2021, to all counsel of record.

/s/ Whitney Payne