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February 10, 2005

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FILED²
FEB 1 0 2005

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Missouri Public Service Commission

Re:

ROBERT K. ANGSTEAD

ROBERT J. BRUNDAGE

CATHLEEN A. MARTIN

STEPHEN G. NEWMAN

MARK W. COMLEY

JOHN A. RUTH

Case No. TC-2005-0228

Dear Judge Roberts:

Enclosed for filing in the above-referenced matter please find the original and five copies of a Motion for Extension of Time to File Response to Complaint.

Would you please bring this filing to the attention of the appropriate Commission personnel.

Thank you very much for your attention.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley comleym@ncrpc.com

MWC:ab Enclosure

cc: Office of Public Counsel

General Counsel's Office

W. R. England, III Brian T. McCartney

Ron Walters

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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Fidelity Telephone Company, Fidelity Communications Services I, Inc., Fidelity Communications Services II, Inc., Grand River Mutual Telephone Company, Lathrop Telephone Company, and BPS Telephone Company,) Service Commission
Complainants,)) Cas No. TC-2005-0228
v.)))
Trinsic Communications, Inc.,	,)
Formerly known as Z-Tel Communications, Inc.,)
)
Respondent.)

MOTION FOR EXTENSION OF TIME TO FILE RESPONSE TO COMPLAINT

COME NOW Respondent Trinsic Communications, Inc. ("Trinsic") and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to respond to the Complaint. In support thereof, Respondent submits the following:

- 1. Fidelity Telephone Company, Fidelity Communications Services I, Inc., Fidelity Communications Services II, Inc., Grand River Mutual Telephone Company, Lathrop Telephone Company and BPS Telephone Company (hereinafter collectively referred to as "Complainants") filed a complaint with the Commission on January 11, 2005.
- 2. In its Notice of Complaint dated January 13, 2005, the Commission directed that a response to the Complaint be filed by Trinsic within 30 days of the date of its Notice of Complaint.
- 3. The undersigned was just recently retained by Trinsic for this matter and has not had sufficient time to examine the allegations in the complaint and coordinate with Trinsic on the

proper response. Trinsic requests an additional fourteen days, up to and including February 24, 2005, to file a response to the Complaint.

- 4. Counsel for Complainants has advised that he has no objection to Trinsic's request for additional time.
- 5. The extension sought will not prejudice any party to the action and will not unfairly delay the disposition of this cause.

WHEREFORE, Respondent respectfully requests the Commission to issue an Order extending the time within which Trinsic may file a response to the Complaint for fourteen days, up to and including February 24, 2005.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

By:

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Attorneys for Trinsic Communications, Inc.

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent via e-mail on this 10th day of February, 2005, to General Counsel's Office at gencounsel@psc.state.mo.us; Office of Public Counsel at opcservice@ded.state.mo.us; W. R. England, III at trip@brydonlaw.com; and Brian T. McCartney apbrocartney@brydonlaw.com.

Mark W. Comley