

NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION
ATTORNEYS AND COUNSELORS AT LAW
MONROE BLUFF EXECUTIVE CENTER
601 MONROE STREET, SUITE 301
P.O. BOX 537
JEFFERSON CITY, MISSOURI 65102-0537
www.ncrpc.com

TELEPHONE: (573) 634-2266
FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD
ROBERT J. BRUNDAGE
MARK W. COMLEY
CATHLEEN A. MARTIN
STEPHEN G. NEWMAN
JOHN A. RUTH

May 10, 2004

FILED

MAY 10 2004

**Missouri Public
Service Commission**

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

Re: The Staff of the Missouri Public Service Commission v.
Lockheed Martin Global Telecommunications Services, Inc.
Case No. TC-2004-0415

Dear Judge Roberts:

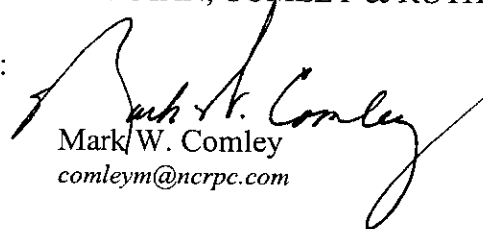
Enclosed for filing in the referenced matter please find the original and five copies of a Second Motion for Extension of Time to Respond to Staff's Motion for Summary Determination; Motion for Protective Order; and Unanimous Stipulation and Settlement Agreement.

Please contact me if you have any questions regarding this matter. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley
comleym@ncrpc.com

MWC:ab

Enclosure

cc: Office of Public Counsel
David Meyer
Winafred Brantl

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

The Staff of the Missouri Public Service)
Commission,)

Complainant,)

Case No. TC-2004-0415

v.)

Lockheed Martin Global)
Telecommunications Services, Inc.,)

FILED

MAY 10 2004

Respondent.)

**Missouri Public
Service Commission**

In the Matter of Lockheed Martin Global)
Telecommunications Services, Inc.'s 2002)
Annual Report to the Commission as an)
Interexchange Telecommunications)
Carrier,)

Case No. XE-2004-0488

**SECOND MOTION FOR EXTENSION OF TIME TO
RESPOND TO STAFF'S MOTION FOR SUMMARY DETERMINATION**

COMES NOW Lockheed Martin Global Telecommunications Services, Inc. (LMGTS or Company) and pursuant to 4 CSR 240-2.050(3)(A) requests an extension of time within which to respond to Staff's motion for summary determination. In support thereof, LMGTS submits the following:

1. On or about April 1, 2004, Staff filed two motions in the same pleading; it moved to consolidate the above captioned cases and moved for summary disposition of the complaint case.
2. On April 29, 2004, LMGTS filed a motion to extend the time for it to file a response to Staff's motion for summary disposition and on May 3, 2004, the Commission granted LMGTS's motion until today, May 10, 2004.

3. Since the filing of LMGTS's motion for extension, Staff and SMGTS have entered a Stipulation and Agreement toward settlement which has been filed with the Commission today. If the Commission should approve the terms of the settlement that Staff and LMGTS propose, there will be no need for a response to or ruling on Staff's motion for summary disposition.

4. Accordingly, LMGTS requests that the time within which it must respond to Staff's motion for summary disposition be extended indefinitely until further order the Commission at least pending its consideration and review of the Stipulation and Agreement between Staff and LMGTS.

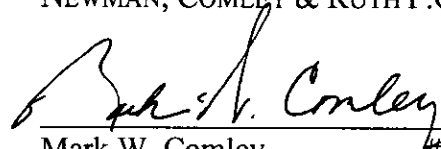
5. Counsel for the Staff has no objection to this request.

WHEREFORE, LMGTS respectfully requests the Commission to issue an Order extending the time within which it may file a response to Staff's motion for summary determination until further order of the Commission.

Respectfully submitted,

NEWMAN, COMLEY & RUTH P.C.

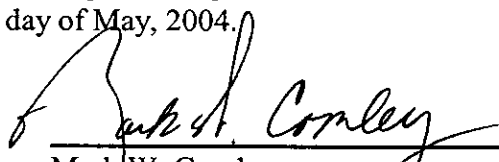
By:


Mark W. Comley #28847
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
(573) 634-2266
(573) 636-3306 FAX

Attorneys for Respondent

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, to **david.meyer@psc.mo.gov**, and Office of Public Counsel at **opcservice@ded.state.mo.us**, on this 10th day of May, 2004.


Mark W. Comley