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December 16, 2004

Via Federal Express

Mr. Dale H. Roberts
Executive Secretary
MISSOURI PUBLIC SERVICE COMMISSION
200 Madison Street, Suite 100
Jefferson City, Missouri 65101

RE: Case No. TO-2005-0117

FILED³
DEC 17 2004
Missouri Public
Service Commission

Dear Mr. Roberts:

Enclosed please find the original and eight copies of each of the Request for Withdrawal and the Motion to File Late-Filed Pleading on behalf of Winstar Communications, LLC in the above-referenced case. Please return one "filed" copy of each pleading to me in the enclosed return envelope.

By copy of this letter, I have served a copy of this motion upon all counsel of record via U.S. mail.

If you have any questions, please give me a call.

Very truly yours,



Mark P. Johnson

MPJ/rg
Encl.

cc: All Parties of Records (w/encl.) (via U.S. mail)

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

Southwestern Bell Telephone, L.P d/b/a SBC
Missouri's Petition to Amend the Section 251/252
Interconnection Agreements between SBC Missouri
And Various Competitive Local Exchange Carriers.

Southwestern Bell Telephone, L.P. d/b/a
SBC Missouri,

Petitioner,

vs.

1-800-RECONEX, Inc., *et al.*,

Respondents.

FILED³

DEC 17 2004

Missouri Public
Service Commission

Case No. TO-2005-0117

MOTION TO FILE LATE-FILED PLEADING

Comes now Winstar Communications, LLC ("Winstar"), by its undersigned attorneys, and moves pursuant to 4 CSR 240-2.015 for waiver of the Commission Order that responses to SBC's Amended Petition be filed by December 13, 2004. Winstar requests that it be allowed to file its response to the Amended Petition, in the form of a Request for Withdrawal, which is being filed and served contemporaneously with filing and service of this pleading. In support of this Motion, Winstar states the following:

1. Winstar has received the Commission's Order requesting filings by Respondents in reply to the Amended Petition filed by SBC. Winstar proposes to respond to the Amended Petition by the Request for Withdrawal filed at the same time as this Motion.

2. Winstar acknowledges that this Motion and the Request for Withdrawal are filed four days after the deadline stated in the Commission's Order. Winstar simply missed the deadline in the crush of other business and deadlines, and by this Motion asks that the Commission grant

Winstar the opportunity to make its position and arguments with regard to the Amended Petition.
Winstar does so in the Request for Withdrawal.

3. Winstar's counsel has consulted with SBC's counsel (Paul Lane) concerning this matter, and may inform the Commission that SBC has no objection to this Motion and the filing of the Request for Withdrawal, as long as SBC is given until December 30, 2004, to respond to the Request for Withdrawal.

Wherefore, Winstar respectfully requests that the Commission waive the filing deadline of December 13, 2004, and grant this Motion for leave to file the Request for Withdrawal.

Respectfully submitted,



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and

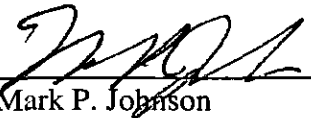
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ATTORNEYS FOR
WINSTAR COMMUNICATIONS, LLC

Dated: December 16, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by First-Class United States mail, postage prepaid, on all parties of record on this 16th day of December, 2004.



Mark P. Johnson

Service List for Case No. TO-2005-0117

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