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

In the Matter of the Application of Level 3	)	
Communications, LLC, and Southwestern	)	
Bell Telephone Company, L.P., d/b/a SBC	)	
Missouri for Approval of their Negotiated	)	Case No. TK-2005-0285
Interconnection Agreement and	)	
Superseding Amendment under Section	)	
252(e)(1) of the Telecommunications Act.	)	

## **MOTION TO EXTEND**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and states:

- 1. On February 23, 2005, Level 3 Communications, LLC and Southwestern Bell Telephone, L.P., d/b/a SBC Missouri filed an application with the Commission for approval of an interconnection agreement under the provision of the Telecommunications Act of 1996. Under Section 252(e)(4) of the Act, the Commission must approve or reject the Agreement no later than May 23, 2005, or the Agreement shall be deemed approved.
- 2. The Commission's February 24, 2005 *Order and Notice* directed the Staff to file a memorandum advising either approval or rejection of the agreement and giving the reasons therefore no later than March 28, 2005.
- 3. The Staff continues to review the interconnection agreement, but is not in a position to advise either approval or rejection of the agreement. The Staff requests an additional two weeks to review the agreement to ensure its terms do not discriminate against telecommunications carriers not a party to the agreement, and that the agreement is not against the public interest, convenience or necessity.

WHEREFORE, the Staff respectfully requests an order extending the filing of the Staff's memorandum to April 11, 2005.

Respectfully submitted,

DANA K. JOYCE General Counsel

## /s/ Marc Poston

Marc Poston Senior Counsel Missouri Bar No. 45722

Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360
Jefferson City, MO 65102
(573) 751-8701 (Telephone)
(573) 751-9285 (Fax)
marc.poston@psc.mo.gov

## **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 28<sup>th</sup> day of March 2005.

/s/ Marc Poston