

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

In re the matter of UCN, Inc. to establish)
an Instate Connection Fee and an Instate)
Cost Recovery Charge)

Case No. XT-2006-0371
Tariff File No. JX-2006-0675

**MOTION FOR EXTENSION OF TIME TO RESPOND TO MOTION TO REJECT TARIFF AND
RESPONSE THERETO**

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and moves that the Commission grant it additional time to file a response in this case. In support of its Motion, Staff states:

1. On March 28, 2006, the Office of the Public Counsel filed a motion requesting the Commission to suspend UCN, Inc.'s tariff sheet of March 7, 2006, with an effective date of April 7, 2006, introducing a \$2.49 monthly service charge, or "In-State Connection Fee," and an In-State Cost Recovery Charge set at 2.99% of a customer's intrastate usage.

2. Subsequently, on April 7, 2006, UCN, Inc. filed a response to the Office of Public Counsel's filing. Staff respectfully requests the opportunity to file its response to both the Office of Public Counsel's filing as well as UCN, Inc.'s filing on or before Tuesday, April 11, 2006. The Commission has directed all parties to file responses to the Office of Public Counsel's Motion by April 7, but the Staff believes that having an opportunity to consider the responses of all parties concerned will result in a more comprehensive response on behalf of the Commission's Staff.

3. The Commission's rule at 4 CSR 240-2.050(3) provides that the Commission may order a period enlarged before the expiration of that period if an act is required or allowed to be done by order of the Commission.

WHEREFORE, Staff requests that the Commission grant it additional time, until Tuesday, April 11, 2006, to file its response in this matter.

Respectfully submitted,

/s/ David A. Meyer

David A. Meyer
Senior Counsel
Missouri Bar No. 46620

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)
davidmeyer@psc.state.mo.us

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or e-mailed to all counsel of record this 7th day of April 2006.

/s/ David A. Meyer