

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

In the Matter of the Cancellation of the Certificate of )  
Service Authority of Velocity The Greatest Phone ) **File No. XD-2012-0160**  
Company Ever, Inc., to Provide Competitive Interexchange )  
Telecommunications Services in the State of Missouri )

In the Matter of the Cancellation of the Certificate of )  
Service Authority of Velocity The Greatest Phone )  
Company Ever, Inc., to Provide Competitive Resold and ) **File No. CD-2012-0161**  
Facilities-Based/UNE Basic Local Telecommunications )  
Services in Portions of the State of Missouri )

**SECOND JOINT MOTION FOR EXTENSION OF TIME TO FILE RESPONSES**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and on its behalf, and that of Velocity The Greatest Phone Company Ever, Inc., (Velocity or Company) moves for the Missouri Public Service Commission (Commission) to extend the filing of responses in the above matters for an additional thirty days. In support thereof, the Staff states as follows:

1. On November 23, 2011, the Staff moved for the cancellation of Velocity's certificates of service authority and associated tariffs to provide intrastate interexchange and basic local exchange telecommunication services in the state of Missouri. The Staff's motion alleged several deficiencies in the Company's filing of annual reports and registration with not only the Commission, but also with the Missouri Secretary of State (SOS).

2. On November 29, 2011, the Commission issued an *Order Directing Notice* in each case, directing any party to file responses to the Staff's motions for cancellation by December 9, 2011.

3. On December 9, 2011, the Staff and the Company filed a joint motion to extend the time for the filing of responses. The extension was to allow the Company additional time to

file its deficient annual reports with the Commission and cure its deficiencies with the SOS. The Commission granted the extension the same day by its *Order Extending Filing Deadline*.

4. On January 6, 2012, the Company filed its 2009 and 2010 annual reports for its basic local telecommunications services and its 2010 annual report for its interexchange telecommunications services with the Commission. The Staff is in the process of reviewing the reports.

5. Velocity has informed the undersigned that it is in the process of completing the necessary paperwork for reinstatement with the SOS, but requests additional time to complete the process.

**WHEREFORE**, the Staff, on its behalf, and that of Velocity, requests that the Commission extend the time for the filing of responses in the above matters until February 8, 2012, to allow the Staff to complete its review of the annual reports and for the Company to correct its deficiencies with the Missouri Secretary of State.

Respectfully submitted,

**/s/Jennifer Hernandez**

Jennifer Hernandez  
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Missouri Public Service Commission  
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### **CERTIFICATE OF SERVICE**

I hereby certify that I have provided a true and correct copy of the foregoing by prepaid First Class United States Postal Mail or electronic mail to: Velocity The Greatest Phone Company Ever, Inc., Attn: Judi Reed, 7130 Spring Meadows West Drive, Holland, OH 43528-9296; Velocity The Greatest Phone Company Ever, Inc., at [judi@velocity.org](mailto:judi@velocity.org); and the Office of the Public Counsel at [opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov) this 9<sup>th</sup> day of January 2012.

**/s/Jennifer Hernandez**