

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

In the Matter of the Application of )  
Network US, Inc., d/b/a CA Affinity, for )  
Approval of Transfer of Assets from )  
ConnectAmerica, Inc., and for Waiver )

Case No. XM-2005-0105

**FOURTH MOTION FOR EXTENSION OF TIME TO FILE  
MEMORANDUM AND RECOMMENDATION**

COMES NOW the Staff of the Missouri Public Service Commission and for its motion states:

1. Network US, Inc. d/b/a CA Affinity (NUS) filed its Application on October 15, 2004, and its Supplement to Application on October 19, 2004. NUS is requesting Commission approval for the transfer of ConnectAmerica Inc.'s assets and customers to NUS.

2. On December 28, 2004, the Commission issued an order directing the Staff to file its Memorandum and Recommendation in this case no later than January 28, 2005.

3. On January 27, 2005, NUS made a tariff submission that is designed, *inter alia*, to incorporate ConnectAmerica's service plans and rates in NUS's tariff. The tariff submission, Tariff File No. YX-2005-0554, bore a proposed effective date of February 26, 2005.

4. On January 28, 2005, the Staff requested an extension to February 16, 2005, i.e., seven business days before the proposed effective date, to review the tariff submission and to file its Memorandum and Recommendation.

5. On February 16, 2005, NUS extended the effective date of the tariff submission to March 5, 2005. On February 16, 2005, the Staff requested until February 24, 2005, i.e., seven

business days before the proposed extended effective date, to file its Memorandum and Recommendation.

6. On February 24, 2005, NUS extended the effective date of the tariff submission to March 15, 2005, to allow additional time for it to provide responses to Staff inquiry. On February 24, 2005, the Staff requested until March 4, 2005, i.e., seven business days before the proposed extended effective date, to file its Memorandum and Recommendation.

7. On March 4, 2005, NUS extended the effective date of the tariff submission to April 4, 2005. The Staff requests until March 24, 2005, i.e., seven business days before the proposed extended effective date, to file its Memorandum and Recommendation.

8. Pursuant to Commission Rule 4 CSR 240-2.050(3), the Commission may extend a filing deadline.

WHEREFORE, the Staff requests until March 24, 2005, to file its Memorandum and Recommendation in this case.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

**/s/ William K. Haas**

William K. Haas  
Deputy General Counsel  
Missouri Bar No. 28701

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7510 (Telephone)  
(573) 751-9285 (Fax)  
[william.haas@psc.mo.gov](mailto:william.haas@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 4<sup>th</sup> day of March 2005.

**/s/ William K. Haas**

William K. Haas