

**BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION**

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

**REQUEST OF SOUTHWESTERN BELL TELEPHONE, L.P. FOR AN EXTENSION OF  
TIME TO RESPOND TO STAFF'S RECOMMENDATION**

Southwestern Bell Telephone, L.P. d/b/a SBC Missouri ("SBC Missouri") hereby requests an additional four days, through and including Friday, April 22, 2005, in which to file its response to Staff's Recommendation filed on April 11, 2005. In support thereof, SBC Missouri states that:

1. On February 23, 2005, Level 3 Communications, LLC ("Level 3") and SBC Missouri jointly submitted to the Commission a negotiated interconnection agreement reached between them, for the Commission's approval.
2. On February 24, 2005, the Commission issued an Order and Notice directing the Staff to file a memorandum recommending either approval or rejection of the agreement, and giving the reasons for its recommendation, by not later than March 28, 2005.
3. On April 11, 2005, the Commission's Staff filed its recommendation regarding the interconnection agreement negotiated between Level 3 and SBC Missouri.<sup>1</sup>
4. On April 12, the Commission issued its Order Directing Response to Staff's Recommendation ("Order"), in which it ordered that Level 3 and SBC Missouri "shall file their response to Staff's Recommendation by not later than April 18, 2005." Order, p. 2.

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<sup>1</sup> The Commission's March 29, 2005 Order Granting Staff's Motion for Extension of Time to File Recommendation allowed Staff an additional two weeks in which to file its recommendation.

5. During the week in which the Commission issued its order, the undersigned attorney was away on pre-scheduled vacation. Having just returned today, the undersigned respectfully submits that an additional period of just four (4) days is necessary so as to effectively consider, prepare and file SBC Missouri's response to the Staff's recommendation.

6. SBC Missouri has conferred with Mr. Marc Poston, Attorney for the Staff, and with Mr. William Steinmeier, Attorney for Level 3, and neither the Staff nor Level 3 has any objection to the grant of this motion. Moreover, allowance of the additional time requested will not impact the Commission's ability to make a timely decision whether to approve the interconnection agreement submitted to it by Level 3 and SBC Missouri.<sup>2</sup> Finally, SBC Missouri has no objection to Level 3 likewise being afforded an additional period, through and including April 22, 2005, in which to file its own response to the Staff's recommendation.

7. The Commission, as well as the Arbitrator appointed in this case, each has sufficient authority to grant SBC Missouri the relief sought by this motion. See, 4 CSR 240-2.050(3)(A); 4 CSR 240-36.040(15).

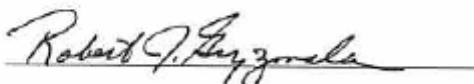
WHEREFORE, SBC Missouri respectfully requests that it be granted an additional four days, through and including Friday, April 22, 2005, in which to file its response to Staff's Recommendation filed on April 11, 2005.

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<sup>2</sup> Pursuant to Section 252(e)(4) of the federal Telecommunications Act of 1996, the Commission has ninety days within which to approve or reject an agreement adopted by negotiation (in this case, by May 24, 2005, which is ninety days after February 23, 2005).

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE, L.P.

BY 

PAUL G. LANE	#27011
LEO J. BUB	#34326
ROBERT J. GRYZMALA	#32454
MIMI B. MACDONALD	#37606

Attorneys for Southwestern Bell Telephone, L.P.  
One SBC Center, Room 3516  
St. Louis, Missouri 63101  
314-235-6060 (Telephone)  
314-247-0014 (Facsimile)  
[robert.gryzmala@sbc.com](mailto:robert.gryzmala@sbc.com)

#### **Certificate of Service**

I hereby certify that copies of the foregoing have been electronically mailed to all counsel of record this 18<sup>th</sup> day of April, 2005.

  
Robert J. Gryzmala

General Counsel  
Marc Poston  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102  
[gencounsel@psc.mo.gov](mailto:gencounsel@psc.mo.gov)  
[Marc.Poston@psc.mo.gov](mailto:Marc.Poston@psc.mo.gov)

Public Counsel  
Office of Public Counsel  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Level 3 Communications, LLC  
William D. Steinmeier, P.C.  
P.O. Box 104595  
Jefferson City, MO 65110-4595  
[wds@wdspc.com](mailto:wds@wdspc.com)