

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

In the Matter of the Application of Southwestern)	
Bell Telephone Co. d/b/a SBC Missouri Filing)	
Tariff Revisions to Suspend Billing and Collection)	<u>Case No. TT-2004-0120</u>
Services for a Customer if the Customer is in)	
Breach of Any Other Agreement Between the)	
Parties)	

**SBC MISSOURI'S MOTION
FOR EXTENSION OF TIME TO RESPOND**

SBC Missouri¹ respectfully requests the Missouri Public Service Commission (“Commission”) to further extend the date for filing responses to the Motions to Reject or Suspend Tariff until September 29, 2003. SBC Missouri has been engaged in discussions with the carriers that have opposed its proposed tariff and has further extended the effective date of its tariff in order to address the concerns they have raised. In support of its Motion, SBC Missouri states:

1. On August 13, 2003, SBC Missouri filed a proposed tariff to add language to its billing and collection service tariff to increase SBC Missouri’s ability to protect its financial interests in the event another carrier subscribing to SBC Missouri’s billing and collection services failed to pay monies owed to SBC Missouri or breached a contractual obligation to SBC Missouri. By its terms, the tariff was scheduled to become effective on September 12, 2003.

2. On September 4, 2003, AT&T of the Southwest, Inc. (“AT&T”) filed a Motion to Reject or Suspend the Proposed Tariff.

¹ Southwestern Bell Telephone, L.P., d/b/a SBC Missouri, will be referred to in this pleading as “SBC Missouri.”

3. On Friday, September 5, 2003, the Commission issued an Order directing SBC Missouri and Staff to file responses to AT&T's Motion by noon on Monday, September 8, 2003. Also on Friday, September 5, 2003, Sprint Communications Company L.P. ("Sprint") filed a Motion to Reject Tariff raising concerns similar to AT&T.²

4. On September 8, 2003, SBC Missouri and Staff filed Motions to extend the time for responding to AT&T's and Sprint's Motions until September 18, 2003. The Commission granted these Motions on September 8, 2003.

5. Following the Commission's grant of additional time to respond to the Motions to suspend tariff, SBC Missouri has been in discussions with AT&T, Sprint and MCI WorldCom Communications, Inc. ("MCI") concerning alternative tariff language that might resolve the concerns these parties have raised.

6. To allow further discussions with AT&T, Sprint and MCI, SBC Missouri has filed a letter with the Commission further extending the effective date of its proposed tariff from September 26 to October 10, 2003. (A copy of this letter is appended as Attachment 1). In the event the dispute can be resolved, it would be unnecessary for either SBC Missouri or Staff to file substantive responses to AT&T's, MCI's and Sprint's Motions.

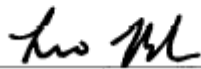
7. Counsel for SBC Missouri has been authorized by counsel for AT&T, MCI, OPC, Sprint and Staff to represent that they have no opposition to this Motion being granted.

² On September 11, 2003, MCI WorldCom filed a similar Motion.

WHEREFORE, SBC Missouri respectfully requests the Commission to extend the date for responding to AT&T's, MCI's and Sprint's Motions until September 29, 2003.

Respectfully submitted,

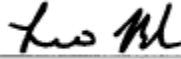
SBC COMMUNICATIONS INC.

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CERTIFICATE OF SERVICE

Copies of this document were served on the following parties by e-mail or first class, postage prepaid, U.S. Mail on September 18, 2003.



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Attachment 1

September 17, 2003

The Honorable Dale Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, Missouri 65102

Re: Tariff Filing JI-2004-0176

Dear Judge Roberts:

Southwestern Bell Telephone, L.P., d/b/a SBC Missouri (SBC Missouri) filed revisions to P.S.C. Mo.-No. 36, Access Services Tariff. The Commission assigned this tariff filing No. JI-2004-0176.

SBC Missouri hereby extends the effective date for this tariff filing from September 26, 2003 to October 10, 2003.

William Voight and William Hass from the Missouri Public Service Commission is aware of this request.

Please refer any questions on this matter to Jason Olson on 314-235-6922.

Very truly yours,

/s/ Jason Olson