

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

In the Matter of the Tariff Filing of)
Sage Telecom, Inc. to Establish a)
Public Switched Network Recovery)
Charge

Case No. CT-2006-0370
Tariff No. JC-2006-0716

**MOTION FOR EXTENSION OF TIME TO RESPOND
TO PUBLIC COUNSEL'S MOTION TO REJECT TARIFF**

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

1. On March 21, 2006, Sage Telecom, Inc. filed a proposed tariff sheet designed to implement a Switched Network Recovery Charge. The tariff sheet bears an effective date of April 1, 2006.

2. On March 28, 2006, the Office of the Public Counsel filed a Motion to Reject Tariff or, in the Alternative, to Suspend Tariff. In support of its motion, Public Counsel refers to rule 4 CSR 240-33.045.

3. On March 30, 2006, the Commission suspended the tariff sheet until May 1, 2006, in order to allow the parties the opportunity to respond to Public Counsel's motion and allow the Commission to further investigate the proposed tariff. The Commission directed that responses to Public Counsel's motion must be filed on or before April 7, 2006.

4. Sage filed its response on April 7, 2006. The Staff respectfully requests the opportunity to respond to Public Counsel's motion and Sage's response on or before Tuesday, April 11, 2006. The Staff believes that having an opportunity to consider both of those pleadings will result in a more complete response by the Staff.

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

Respectfully submitted,

/s/ William K. Haas

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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 7th day of April 2006.

/s/ William K. Haas