BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Application of Starbeam)	
HIS, LLC for Designation as an Eligible)	Case No. DA-2022-0280
Telecommunications Carrier)	

STAFF MOTION TO EXTEND

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through the undersigned counsel, and hereby respectfully submits this *Motion to Extend* stating:

- 1. On April 12, 2022, the above-referenced Starbeam HIS, LLC, ("Starbeam"), filed an *Application* requesting designation as an Eligible Telecommunications Carrier (ETC) with the Commission. However, the Company failed to file meet certain requirements of Commission rules 20 CSR 4240-2.060, 20 CSR 4240-2.080, 20 CSR 4240-31.015 and 20 CSR 4240-31.016 in its original filing.
- 2. Commission rule 20 CSR 4240-31.016 governs the specific eligible telecommunications carrier requirements that each applicant must meet. Applications must also comply with 20 CSR 4240-2.060 and shall be verified by oath as to the truthfulness contained in the application by an officer or director of the applicant. Applications must also be signed an attorney pursuant to 20 CSR 4240-2.080. Starbeam failed to state that it will comply with the requirements expected of an ETC established by 20 CSR 4240-31.015, and to certify that it met certain federal standards governed by Title 47 Sections 54.201 and 54.202.

- 3. Staff has contacted Starbeam and it indicated that it will supplement the *Application* and address these requirements. Starbeam did update its application and filed the same with the Commission on May 3, 2022.
- 4. Staff has reviewed the updated Application; however, there are a few questions remaining before Staff may make a recommendation on this matter.
- 5. Staff submitted Data Requests to Starbeam on May 12, 2022, in order for Starbeam to answer the remaining questions about its Application.
- 6. Staff will be unable to provide a recommendation to the Commission by the Order date of May 14, 2022, due to the outstanding questions remaining from Starbeam. Starbeam has until June 1, 2022, to respond to Staff's Data Requests. Staff will need an additional five days to review the answers and provide a recommendation to the Commission. Consequently Staff requests an extension to June 6, 2022 to file its recommendation; however, Staff anticipates filing a recommendation within five days after receiving acceptable responses to Staff's data requests.

WHEREFORE, Staff prays that the Commission will permit it an extension to June 6, 2022, to file its Recommendation in this matter, and to grant such other and further relief as it finds just in the circumstances.

Respectfully submitted,

/s/ J. Scott Stacey

J. Scott Stacey
Senior Counsel
Missouri Bar No. 59027
Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 522-6279 (Telephone)
(573) 751-9285 (Fax)
scott.stacey@psc.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 12th day of May, 2022, to all counsel of record.

/s/ J. Scott Stacey