

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

Southwestern Bell Telephone Company d/b/a AT&T)	
Missouri's Petition for Compulsory Arbitration of)	
Unresolved Issues for an Interconnection Agreement)	Case No. IO-2011-0057
With Global Crossing Local Services, Inc. and Global)	
Crossing Telemanagement Inc.)	

**JOINT MOTION FOR LEAVE TO FILE CONFORMED INTERCONNECTION
AGREEMENT AND PARTIES' STATEMENTS BY DECEMBER 29**

COME NOW the parties, AT&T Missouri¹ and Global Crossing,² and pursuant to Commission Rule 36.050 (4 CSR 240-36.050)(1), respectfully move the Commission to allow them through and including December 29, 2010, in which to file their (a) fully conformed interconnection agreement and (b) compliance statements. In support thereof, the parties state:

1. On December 15, the Commission issued and filed in EFIS its Decision in this proceeding, in which the Commission approved the Arbitrator's November 29 Final Report. Commission Rule 36.050 (4 CSR 240-36.050)(1) states: "Unless the [C]ommission orders otherwise, within seven (7) days of the filing of a [C]ommission order approving, rejecting or modifying the arbitrator's final report, the parties shall file with the [C]ommission the entire agreement that was the subject of the negotiation. The agreement shall conform in all respects to the [C]ommission's order." The rule further states: "Concurrently with the filing of the conformed agreement, the parties shall each file statements that indicate whether the agreement complies with the requirements of sections 251 and 252 of the Act, Missouri statutes, and the [C]ommission's rules."

2. Given the press of other current business upon the parties, as well as the parties' need to accommodate various employees' work schedules during this holiday period, the parties

¹ Southwestern Bell Telephone Company d/b/a AT&T Missouri ("AT&T Missouri").

² Global Crossing Local Services, Inc. and Global Crossing Telemanagement Inc. (collectively, "Global Crossing").

respectfully submit that a period through and including December 29 in which to file their conformed agreement and compliance statements is needed and would be appropriate under the circumstances. The grant of their request would prejudice no one, as there are no parties to this proceeding other than those responsible for filing the agreement.

WHEREFORE, AT&T Missouri and Global Crossing respectfully move the Commission to enter an order allowing them through and including December 29, 2010, to file their fully conformed interconnection agreement and compliance statements.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE
COMPANY D/B/A AT&T MISSOURI

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GLOBAL CROSSING LOCAL SERVICES,
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CERTIFICATE OF SERVICE

Copies of this document and the attachment thereto were served on the following by e-mail on December 16, 2010.


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