

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

In the Matter of the Application of Tennessee)	
Telephone Service, LLC d/b/a Freedom)	
Communications USA, LLC for a Certificate)	
of Service Authority to Provide Resold and)	
Facilities-Based/UNE Basic Local)	Case No. LA-2010-0103
Telecommunications Services in Portions of)	
the State of Missouri and to Classify Said		
Services and the Company as Competitive		

STAFF'S SECOND MOTION FOR EXTENSION OF TIME

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and respectfully request an extension of time:

1. On September 28, 2009, Tennessee Telephone Service, LLC d/b/a Freedom Communications USA, LLC (Applicant) filed an application with the Commission seeking authority to provide resold and facilities-based/UNE basic local telecommunication services in portions of the State of Missouri and to classify the Applicant as competitive.

2. On October 19, 2009, the Missouri Public Service Commission (Commission) issued an Order *Directing Staff Status Report* by October 26, 2009.

3. On October 26, 2009, Staff filed a *Status Report* stating that it believed it would file its recommendation no later than November 20, 2009.

4. On November 17, 2009, Staff filed a *Motion for Extension of Time* to file its recommendation on December 2, 2009. On November 18, 2009 the Commission granted Staff motion.

5. Unfortunately, Staff has not received all of the information necessary to completely provide its recommendation. Staff believes that it will receive the information and have adequate time to review it and file its recommendation no later than January 15, 2010.

WHEREFORE, because Staff is still gathering information and needs sufficient time to obtain and review that information, Staff moves that the Commission to grant Staff's recommendation deadline from December 2, 2009 to January 15, 2010.

Respectfully submitted,

/s/ Jaime N. Ott
Jaime N. Ott
Assistant General Counsel
Missouri Bar No. 60949

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8700 (Telephone)
(573) 751-9285 (Fax)
jaime.ott@psc.mo.gov (E-mail)

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 2nd day of December 2009.

/s/ Jaime N. Ott