



Commissioners

SHEILA LUMPE  
Chair

M. DIANNE DRAINER  
Vice Chair

CONNIE MURRAY

ROBERT G. SCHEMENAUER

KELVIN L. SIMMONS

Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://www.psc.state.mo.us>

October 4, 2000

BRIAN D. KINKADE  
Executive Director

GORDON L. PERSINGER  
Director, Research and Public Affairs

WESS A. HENDERSON  
Director, Utility Operations

ROBERT SCHALLENBERG  
Director, Utility Services

DONNA M. KOLILIS  
Director, Administration

DALE HARDY ROBERTS  
Secretary/Chief Regulatory Law Judge

DANA K. JOYCE  
General Counsel

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

RE: Case No. TA-2000-323/TO-2001-134

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and eight (8) conformed copies of a **STAFF'S MOTION FOR EXTENSION OF TIME**.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Bruce H. Bates  
Assistant General Counsel  
(573) 751-7434  
(573) 751-9285 (Fax)

BHB:sw  
Enclosure  
cc: Counsel of Record

FILED<sup>2</sup>

OCT 4 2000

Missouri Public  
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

FILED<sup>2</sup>  
OCT 4 2000  
Missouri Public  
Service Commission

In the Matter of the Application of 2nd ) Case No. TA-2000-323  
Century Communications, Inc. for a ) Tariff No. 200100252  
Certificate of Service Authority to Provide )  
Basic Local Telecommunications Services )  
in the State of Missouri and to Classify )  
Such Services and the Company as )  
Competitive )

In the Matter of 2<sup>nd</sup> Century ) Case No. TO-2001-134  
Communications, Inc.'s Request for ) Tariff No. 200100253  
Recognition of its Name Change to 2<sup>nd</sup> )  
Century Communications Group, Inc. ) (Consolidated)

STAFF'S MOTION FOR EXTENSION OF TIME

COMES NOW the Staff ("Staff") of the Missouri Public Service Commission  
("Commission") and for its *Motion for Extension of Time* states as follows:

1. Staff restates and reincorporates all statements and arguments contained in its *Staff Recommendation* and *Motion to File Recommendation Out of Time*, filed September 26, 2000.
2. On September 14, 2000, the Commission issued an order in which it directed Staff to file a recommendation in this case by September 25, 2000. Due to inadvertence on Staff's behalf, the recommendation was filed one day late.

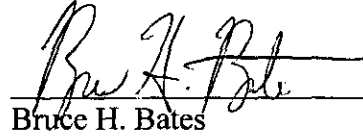
3. On September 29, 2000, the Commission issued an order in which it directed Staff to “file, no later than October 4, 2000, its recommendation and memorandum in compliance with the Order Consolidating Cases and Directing Filing, issued on September 14, 2000.” Staff infers that this refers to that section of the *Memorandum of Staff’s Recommendation* dealing with the Basic Local Exchange Certificate of Service Authority in which Staff states, “[t]his tariff is currently under review by the Staff.”

4. Regrettably, Staff has not been able to complete its analysis due to circumstances beyond its control. Staff respectfully requests that the Commission grant it until 3:00 P.M. on October 11, 2000, or seven (7) working dates before the effective date of the tariff, to file its recommendation, as provided for by Internal Procedure No. 34. IP-34.6 states in relevant part that “[a] Staff pleading addressing a tariff sheet shall be filed no later than 3:00 p.m. on the seventh (7<sup>th</sup>) working day (excluding holidays) prior to the effective date of the tariff...”

WHEREFORE, Staff prays that the Commission grant its *Motion for Extension of Time* for the reasons set out above.

Respectfully submitted,

DANA K. JOYCE  
General Counsel

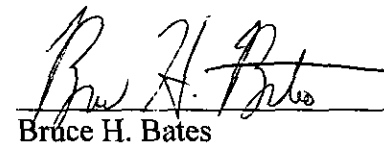


Bruce H. Bates  
Assistant General Counsel  
Missouri Bar No. 35442

Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-7434 (Telephone)  
(573) 751-9285 (Fax)  
[bbates@mail.state.mo.us](mailto:bbates@mail.state.mo.us) (E-Mail)

### **Certificate of Service**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel or parties of record as shown on the attached service list this 4th day of October 2000.

  
Bruce H. Bates

**Service List for**  
**Case No. TA-2000-323/TO-2001-134**  
**Revised: October 4, 2000 (SW)**

**Office of the Public Counsel**  
**P.O. Box 7800**  
**Jefferson City, MO 65102**

**Paul G. Lane/Katherine C. Swaller**  
**Leo J. Bub/Anthony Conroy**  
**Southwestern Bell Telephone Company**  
**One Bell Center, Room 3520**  
**St. Louis, MO 63101-1976**

**Mark W. Comley**  
**Newman, Comley & Ruth, P.C.**  
**601 Monroe Street, Suite 301**  
**Jefferson City, MO 65101**