BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application of |) | |
|--|---|-----------------------|
| ALEC, Inc. for Certificates of Service |) | |
| Authority to Provide Basic Local |) | |
| Exchange Telecommunications Services |) | Case No. TA-2009-0137 |
| and Interexchange Telecommunications |) | |
| Services in the State of Missouri and to |) | |
| Classify Those Services and the |) | |
| Company as Competitive |) | |

MOTION FOR EXTENSION

COMES NOW, ALEC, Inc. ("ALEC"), by counsel, and respectfully states the following in support of its Second Motion for Extension ("Motion") with respect to the above-captioned proceeding:

- 1. On October 15, 2008, ALEC filed an application requesting a certificate of service authority to provide basic local and interexchange telecommunications services, and for competitive classification ("Application").
- 2. On November 6, 2008, the Staff of the Missouri Public Service Commission ("Staff") sent a letter to ALEC explaining that ALEC's application either lacks the requested financial information or fails to pass the financial tests.
- 3. On November 18, 2008, Staff filed its first Status Report requesting an extension until December 19, 2008, to file its recommendation. On November 18, the Commission granted that motion.
- 4. On December 10, 2008, ALEC submitted additional financial information in an effort to comply with the Commission's application requirements.

- 5. On December 18, 2008, counsel for ALEC requested an opportunity to speak with Staff's financial analyst to discuss ALEC's financial information as it relates to the Commission's requirements.
- 6. On December 19, 2008, Staff filed its second Status Report requesting an extension until January 9, 2009, to file its recommendation. On December 19, the Commission granted that motion.
- 7. On January 6, 2009, ALEC filed its first motion for extension of time, requesting an extension until January 31, 2009 for Staff to file its recommendation. The extension was necessary in order for ALEC to complete discussions of ALEC's supplementary information with Staff. On January 7, the Commission granted that motion.
- 8. On January 14, 2009, ALEC held a conference call with members of the Commission's Utility Services Division, including David Murray. During that call, the parties agreed that ALEC would provide updated financial information that would reflect ALEC's current financial standing as of January 2009. This information would incorporate changes to ALEC's finances due to activities that had occurred after ALEC first filed its Application on October 15, 2008.
- 9. In order for ALEC to provide Staff with financial information current as of January 2009, ALEC can submit such figures no earlier than February 15, 2009.
- 10. Accordingly, ALEC respectfully requests that the Commission allow ALEC sufficient time to compile its financial information as of January 2009, and for Staff to make its recommendation to the Commission.
- 11. Staff has indicated that it does not oppose the extension requested for Staff to file its recommendation.

WHEREFORE, ALEC respectfully requests an extension until March 31, 2009, for Staff to file its recommendation as to ALEC's application in the above-captioned proceeding.

Respectfully submitted,

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Counsel for ALEC, Inc.

DATE: January 21, 2009

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 21st day of January, 2009.

Gregory C. Lawhon