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FILED

JUN 08 2000

Missouri Public
Service Commission

TE-2000-806

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

Re: Long Distance of Michigan, Inc.
1999 Annual Report

Dear Mr. Roberts:

Please find enclosed for filing an original and eight (8) copies of Motion For Extension Of Time To File 1999 Annual Report and one original of the 1999 Annual Report, both filed on behalf of Long Distance of Michigan, Inc. Copies of the Motion have been sent this date to the General Counsel's Office and the Office of the Public Counsel. Thank you.

Sincerely,

Brent Stewart
Brent Stewart

CBS/bt

Enclosures

cc: General Counsel's Office
Office of the Public Counsel
Cary Roesel

FILED³

JUN 08 2000

Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

In the Matter of the filing of Long)
Distance of Michigan, Inc.'s 1999 Annual)
Report.)

Case No. TE-2000-806

MOTION FOR EXTENSION OF TIME TO FILE
1999 ANNUAL REPORT

Comes now Long Distance of Michigan, Inc. ("LDMI" or "the Company"), by and through counsel and pursuant to 4 CSR 240-10.080 and 4 CSR 240-2.015, and for its Motion For Extension Of Time To File 1999 Annual Report respectfully states as follows:

1. On or about May 2, 2000, LDMI attempted to file its 1999 verified Annual Report with the Commission. Said Annual Report admittedly was submitted after the April 15, 2000 deadline mandated by 4 CSR 240-10.080(1) and Section 392.210 RSMo 1994. As such, the Annual Report was rejected for filing and returned to the Company with instructions to re-file same along with a pleading, signed by counsel, requesting an extension. In addition, the filing was rejected because the Company had not included all the financial information on the form provided but rather provided its financial information in the form of an attachment.

2. It is unclear to counsel exactly why the Company's Annual Report was not submitted by the April 15, 2000 deadline, but it was either because of delays in the United States Mail or because of inadvertent internal difficulties within the Company in meeting the filing deadline. In either case, it was not the Company's intent to ignore the Commission's rule. In fact, upon receiving back the initially rejected Annual Report, the Company in an attempt to remedy the situation as quickly as possible transferred the financial information onto the form provided and then attempted to resubmit it on or about May 17, 2000. Unfortunately, this second attempted filing was again rejected since the Company attempted to late-file

without going to the expense of hiring an attorney and having that attorney file the required pleading.


3. Upon receipt of the Commission's notification that it had again rejected the filing on or about May 17, 2000, the Company sought, through its national regulatory counsel, local Missouri counsel for the purpose of re-submitting the Company's Annual Report as quickly as possible.

4. 4 CSR 240-10.080(8) and 4 CSR 240-2.015 (to the extent applicable) allows a utility to request an extension of time within which to file the utility's annual report provided the reasons therefore are stated. Counsel has attempted to do so based on the information available to him and has included with this pleading one original of the Company's 1999 Annual Report (exactly as it has been received by counsel) for filing in the interest of providing the Commission with the Company's 1999 Annual Report as quickly as possible.

5. If the Records Department accepts the Annual Report for filing today, the Commission will be able to dispose of this matter in a manner similar to that used in numerous other recent late-filed Annual Report cases. However, should the Records Department for some reason again reject the Annual Report itself for some additional deficiency, counsel necessarily will require additional time within which to forward the Report back to the Company for further revisions, then receive, prepare and again attempt to re-file same.

WHEREFORE, Long Distance of Michigan, Inc. respectfully moves the Commission to grant this Motion For Extension Of Time To File 1999 Annual Report, to accept as now submitted for filing the Company's 1999 Annual Report under the applicable Commission rules, or in the alternative, should the Records Department again reject the Annual Report for filing this date, issue an order granting the Company at least an additional thirty (60) days to

again revise then attempt to re-file its 1999 Annual Report.



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ATTORNEY FOR LONG DISTANCE
OF MICHIGAN, INC.

CERTIFICATE OF SERVICE

The undersigned certifies that the original 1999 Annual Report of Long Distance of Michigan, Inc. was submitted this date to the Commission's Records Department, and that a true copy of the foregoing Motion was sent this date to the General Counsel's Office and the Office of the Public Counsel by hand-delivery, this 8th day of June, 2000.

