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James M. Fischer Larry W. Dority

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March 6, 2000

Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 3660 Jefferson City, Missouri 65102

MAR 0 6 2000 Missouri Public

Service Commission

FILED²

RE: TO-2000-482

Dear Mr. Roberts:

Enclosed are the original and fourteen (14) copies of ALLTEL's Motion to Enlarge Response Time for filing in the above-referenced matter. A copy of the foregoing Motion has been hand-delivered or mailed this date to parties of record.

Thank you for your attention to this matter.

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Sincerely, am M. Frid

James M. Fischer

/jr Enclosures

cc: Jeanne Fischer Dana K. Joyce Michael Dandino Craig Johnson

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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FILED² MAR 0 6 2000

Missouri Public vvice Commission

Application for Approval of Interconnection Agreement between Southwestern Bell Wireless, Inc. and ALLTEL Communications Services Corporation under the Telecommunications Act of 1996

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Case No. TO-2000-482

MOTION TO ENLARGE RESPONSE TIME

COMES NOW ALLTEL Communications Services Corporation (ALLTEL), pursuant to 4 CSR 240-2.050(4), and respectfully moves the Commission to enlarge the time period within which ALLTEL may respond to the "Application of MITG to Participate Without Intervention, Suggestions Regarding Approval" filed in this matter on February 24, 2000. In support of this Motion, ALLTEL sets forth the following:

1. On February 29, 2000, the Commission entered its "Order Making ALLTEL A Party," whereby ALLTEL Communications Services Corporation is made a party to this case, said Order becoming effective on March 10, 2000.

2. On February 24, 2000, the Missouri Independent Telephone Company Group (MITG) filed their "Application of MITG to Participate Without Intervention, Suggestions Regarding Approval" ("MITG Application"). ALLTEL, not being a party to this proceeding at that point in time, did not receive a copy of said pleading and, in fact, just became aware of the pleading last Friday, March 3, 2000.

3. Pursuant to 4 CSR 240-2.080(12), parties shall be allowed ten (10) days from the date of filing in which to respond to any motion or other pleading unless otherwise ordered by the commission. Accordingly, ALLTEL's responsive pleading would be due today, March 6, 2000.

4. The Commission's Rule 4 CSR 240-2.050(4) ("Computation of Effective Dates") provides, *inter alia*, that the Commission, at its discretion, may order the specified time period enlarged if a request is made before the expiration of the period originally prescribed or extended by a previous order.

5. This request is made before the expiration of the period prescribed by the Commission's Rules of Practice and Procedure, and ALLTEL respectfully submits that no party will be prejudiced by the Commission's granting of this Motion.

6. ALLTEL requests that the Commission enlarge the time period for ALLTEL to file its responsive pleading to the MITG Application, with said pleading being due on Monday, March 13, 2000.

7. Copies of all correspondence and filings in this docket should be served upon ALLTEL by mailing or faxing them to:

> James M. Fischer, Esq. Larry W. Dority, Esq. FISCHER & DORITY, P.C. 101 West McCarty, Suite 215 Jefferson City, MO 65101 Phone: 573-636-6758 Fax: 573-636-0383

ATTORNEYS FOR ALLTEL

WHEREFORE, ALLTEL respectfully requests that the Commission enter its Order enlarging the time period within which ALLTEL may file its responsive pleading to the MITG Application, to Monday, March 13, 2000.

James M. Fischer, Esq. MO Bar # 27543 Larry W. Dority, Esq. MO Bar #25617 FISCHER & DORITY, P.C. 101 West McCarty, Suite 215 Jefferson City, MO 65101 Telephone: 573-636-6758 Facsimile: 573-636-0383

ATTORNEYS FOR ALLTEL

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered or mailed, First Class mail, postage prepaid, this 6 day of March 2000, to:

Michael F. Dandio Office of the Public Counsel P.O. Box 7800 Jefferson City MO 65102

Jeanne Fischer Southwestern Bell Wireless, Inc. 13075 Manchester, 1st Floor St. Louis MO 63131 Dana K. Joyce, General Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City MO 65102

Craig S. Johnson Andereck Evans Milne Peace & Johnson P.O. Box 1438 Jefferson City MO 65102-1438

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