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March 14, 2000

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

FILED<sup>2</sup>
MAR 1 4 2000

Service Compublic

Re:

Case No. TA-2000-452, Everest Connections Corporation

Dear Mr. Roberts:

Please find enclosed for filing in the above-referenced case an original and fourteen copies of Applicant's Motion For Extension of Time.

A copy of this filing have been sent this date to counsel for all parties of record. Thank you.

Sincerely,

Brent Stewart

CBS/bt

Enclosure

cc: Office of the Public Counsel

Nathan Williams, General Counsel's Office

Mimi MacDonald (SWBT)

Kathy Troughton

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

FIL	ED <sup>2</sup>
MAR 1 4	2000

In the Matter of the Application of	)	1 4 200 <b>0</b>
Everest Connections Corporation for a	)	Service Commission  Case No. TA-2000-452
Certificate of Service Authority to Provide	)	or vice Commis
Basic Local Telecommunications Service	)	Case No. TA-2000-452
In Portions of the State of Missouri and to	)	
Classify Said Services and the Company	)	
as Competitive.	)	

## **MOTION FOR EXTENSION OF TIME**

Comes now Applicant Everest Connections Corporation ("Everest"), and pursuant to the Commission's Order Granting Intervention and Directing Filing, issued in this case on February 28, 2000, respectfully states as follows:

- 1. In its Order Granting Intervention and Directing Filing, issued in this case on February 28, 2000, the Commission ordered the parties to file either a proposed procedural schedule, a Stipulation and Agreement, or a date certain by which such Stipulation and Agreement would be filed, no later than March 22, 2000.
- 2. On March 6, 2000, Everest received the "standard form letter" from Staff indicating that in Staff's opinion, Everest did not meet the Staff's financial test. Immediately thereafter, Everest unsuccessfully attempted to contact Mr. Ron Bible to discuss the matter. Only yesterday was Everest first able to discuss the matter with Mr. Bible.
- 3. At this point it is Everest's intention to supplement its financial information, perhaps following the surety bond procedure or other options set forth in the Commission's January 25, 2000 Order of Rulemaking regarding new rule 4 CSR 240-32.110.
  - 4. In order to provide Everest and the Staff additional time to work through Staff's

concerns, Everest requests that the parties be given additional time within which to file a either a Stipulation and Agreement or a proposed procedural schedule. Everest anticipates that an extension of approximately 30 days will be sufficient and hopes to be able to make such a filing on or before April 24, 2000, sooner if possible.

5. Counsel for Everest has contacted counsel for Staff and intervenor Southwestern Bell and they have indicated no objection to this request. Counsel was unable to reach the attorney for the Office of the Public Counsel but does not anticipate any objection.

WHEREFORE, Applicant Everest Connections Corporation respectfully moves the Commission to grant the parties an extension of time within which to file either a Stipulation and Agreement, or a proposed procedural schedule, on or before April 24, 2000.

Respectfully submitted,

Charles Brent Stewart, MoBar #34885 STEWART & KEEVIL, L.L.C. 1001 Cherry Street, Suite 302 Columbia, Missouri 65201 (573) 499-0635 (573) 499-0638 (fax)

hale Brent Stewart

ATTORNEY FOR APPLICANT EVEREST CONNECTIONS CORPORATION

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent to counsel for all parties of record in Case No. TA-2000-452 by placing same in the U.S. Mail, first class postage prepaid, or by hand-delivery, this 14<sup>th</sup> day of March, 2000.