

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

IN THE MATTER OF THE APPLICATION OF)
DPI TELECONNECT, LLC)
FOR DESIGNATION AS AN ELIGIBLE) **FILE NO. CO-2010-0054**
TELECOMMUNICATIONS CARRIER)

MOTION FOR LEAVE TO RESPOND TO STAFF RECOMMENDATION

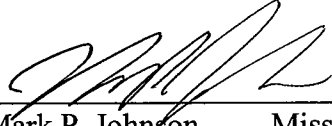
COMES NOW dPi Teleconnect, LLC (“dPiTeleconnect”), by and through the undersigned attorney, and pursuant to 4 CSR 240-2.080(3), files this Motion for the Missouri Public Service Commission’s (“Commission”) consideration, respectfully stating the following:

1. On August 7, 2009, dPiTeleconnect filed an Application for Designation as an Eligible Telecommunications Carrier, requesting ETC designation throughout the service territory of Southwestern Bell Telephone Company, L.P. d/b/a AT&T, for the purpose of receiving federal universal service support.

2. On March 5, 2010, Staff filed a Recommendation requesting that the Commission issue an order denying dPiTeleconnect’s Application for ETC designation, or, alternatively, that the Commission allow dPiTeleconnect thirty (30) days to respond to and resolve issues raised by Staff. By this Motion, dPiTeleconnect seeks leave of the Commission to respond to Staff’s Recommendation and for thirty days to do so. Thus, dPiTeleconnect seeks leave of the Commission to respond to Staff’s Recommendation no later than April 5, 2010.

WHEREFORE, dPiTeleconnect respectfully requests that the Commission grant it thirty days leave to respond to and resolve issues raised by Staff.

Respectfully submitted,



Mark P. Johnson Missouri Bar # 30740
Sonnenschein Nath & Rosenthal LLP
4520 Main, Suite 1100
Kansas City, Missouri 64111
(816) 460-2424
(816) 531-7545 (Fax)
mjohnson@sonnenschein.com

Attorneys for dPiTeleconnect, LLC

CERTIFICATE OF SERVICE

I hereby certify that I have on this 8th day of March, 2010, served a true copy of the foregoing Motion upon the following parties, listed below, in accordance with Commission rules.

Office of the Public Counsel
PO Box 7800
Jefferson City, MO 65102

Jennifer Hernandez
Office of the General Counsel
Missouri Public Service Commission
PO Box 360
Jefferson City, MO 65102

/Mark P. Johnson/
Mark P. Johnson

VERIFICATION

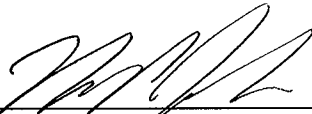
STATE OF MISSOURI)
)
COUNTY OF JACKSON) ss.

Comes now Mark P. Johnson, being of lawful age and duly sworn, and states the following:

1. My name is Mark P. Johnson and I am attorney for dpi Teleconnect, LLC. I have been authorized to execute this Affidavit on behalf of dpi Teleconnect, LLC.

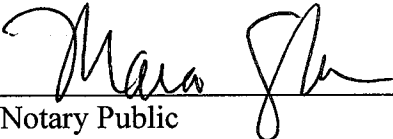
2. I have reviewed the foregoing Application and state that its contents are true and accurate to the best of my knowledge and belief.

Further affiant sayeth not.



Mark P. Johnson

Subscribed and sworn to before this 8th day of March, 2010.



Notary Public

My commission expires:

