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October 25, 1999

JEFFERSON CITY, MISSOURI 65102-0537

FILED

OCT 2 5 1999

The Honorable Dale Hardy Roberts Secretary/Chief Regulatory Law Judge Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102-0360

Missouri Public Service Commission

Re:

Intercontinental Communications Group, Inc., d/b/a Fusion - Trucker Phone

Case No. TA-2000-259

Dear Judge Roberts:

Please find enclosed for filing an original and fourteen copies of a Motion for Extension of Time to Respond to Commission Order.

Please contact me if you have any questions regarding this filing. Thank you.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:

Mark W. Comley

MWC:ab Enclosure

cc:

Office of Public Counsel

Monique Byrnes

FILED 0CT 2 5 1999

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

| In the Matter of the Application of |) | Missouri Public Service Commission |
|---------------------------------------------|---|---------------------------------------|
| Intercontinental Communications Group, Inc. |) | |
| d/b/a Fusion - Trucker Phone |) | |
| for a Certificate of Service Authority |) | Case No. TA-2000-259 |
| To Provide Competitive Intrastate |) | |
| Telecommunications Services in |) | |
| Missouri |) | |

MOTION FOR EXTENSION OF TIME TO RESPOND TO COMMISSION ORDER

Comes now Intercontinental Communications Group, Inc. d/b/a Fusion-Trucker Phone (Fusion) and for its above-entitled motion states the following to the Commission:

- 1. On September 29, 1999, Fusion filed its application requesting a certificate of service authority to provide intrastate interexchange telecommunications services in the state of Missouri.
- 2. On October 14, 1999, the Commission entered a Notice of Deficiency in which it advised of an inconsistency between the application and the tariffs accompanying it. The Commission further directed Fusion to file an amended pleading or substitute tariff sheets correcting the inconsistency by October 25, 1999.
- 3. Since the entry of the Notice of Deficiency, Fusion has contacted the Commission Staff concerning the discrepancy between the application and the proposed tariffs and Fusion will prepare and file substitute tariffs which should completely resolve the matter. Fusion needs additional time to file those tariffs.
- 4. Fusion needs an additional 4 days, up to and including October 29, 1999 within which to file the substitute tariff sheets. The tariffs have been prepared and have been mailed to undersigned counsel and are expected to arrive in the next two days. The additional time is

requested not for purposes of delay or inconvenience to the Commission but rather on account of conditions that are excusable. No party will be prejudiced by the extension of time.

WHEREFORE, Fusion respectfully requests the Commission to extend the time within which to file substitute tariffs in response to the Notice of Deficiency for four days, up to and including October 29, 1999.

Respectfully submitted,

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Mark W. Comley

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Attorneys for Intercontinental Communications Group, Inc. d/b/a Fusion-Trucker Phone

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been handdelivered or mailed, postage prepaid, this 25th day of October 1999, to:

> Office of the Public Counsel P.O. Box 7800 Jefferson City, Missouri 65102

> > Mark W. Comley