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January 16, 2001

FILED<sup>3</sup>

JAN 16 2001

Missouri Public  
Service Commission

Dale Hardy Roberts  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65101

Re: Case No. TO-98-115

Dear Judge Roberts:

Attached for filing with the Commission is the original and eight (8) copies of AT&T Communications of the Southwest, Inc.'s Motion for Extension in the above referenced matter.

I thank you in advance for your cooperation in bringing this to the attention of the Commission.

Very truly yours,

AT&T COMMUNICATIONS OF THE  
SOUTHWEST, INC.

By: Kevin K. Zarling (je)  
Kevin K. Zarling

Attachment

cc: All Parties of Record

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

FILED<sup>3</sup>  
JAN 16 2001

Missouri Public  
Service Commission

In the Matter of AT&T Communications of the )  
Southwest, Inc.'s Petition for Second Compulsory )  
Arbitration Pursuant to Section 252(b) of the )  
Telecommunications Act of 1996 to Establish an )  
Interconnection Agreement with Southwestern Bell )  
Telephone Company )

CASE NO. TO-98-115

**AT&T COMMUNICATIONS OF THE SOUTHWEST, INC.**  
**MOTION FOR EXTENSION**

COMES NOW, AT&T Communications of the Southwest, Inc. ("AT&T"), and for its Motion for Extension of the Commission's January 22, 2001 deadline in the above-referenced proceeding would respectfully state as follows:

1. On December 12, 2000 the Commission issues its Order Directing Filing, which required AT&T, Southwestern Bell Telephone Company ("SWBT"), and the Commission Staff to jointly file a list of remaining issues by December 29, 2000. In addition, the Order requires the Parties to separately file proposed findings of fact and conclusions of law by January 22, 2001.
2. Because this case had been inactive for so long since the hearing conducted on September 4, 1998, gathering the necessary information to prepare the filing has proved very time consuming. For example, many relevant AT&T personnel have either left the company, or were otherwise unavailable over the holidays. In addition, some of the documents from the case file had been archived or needed to be located which has added significantly to the time required to prepare the Proposed Conclusions of Law and Findings of Fact. Consequently, given the timing of the Commission's Order and the

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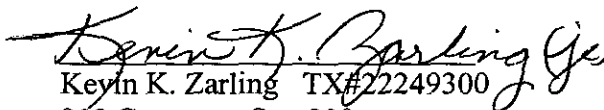
timelines therein, the deadline for providing proposed findings of fact and conclusions of law is extremely difficult for AT&T to comply with and AT&T requests additional time.

3. AT&T requests an additional week, until January 29, 2001, for all Parties to file their proposed findings of fact and conclusions of law. This extension will allow all Parties to more thoroughly examine the record and propose what each Party believes are accurate and appropriate findings and conclusions. While AT&T appreciates the impact of SWBT §271 application on the Commission's desire to resolve this matter expeditiously, based on the current schedule in Case No. TO-99-227 a one-week extension in this proceeding should not unduly impact the Commission's deliberations in SWBT's §271 case.

4. AT&T has been authorized by counsel for SWBT and for Commission Staff to represent that neither SWBT nor Commission Staff opposes AT&T's motion for a one-week extension. Given the passage of time in this case, the timing of the Commission's December 12, 2000 Order, and the lack of any harm resulting from a one-week extension, the Commission should find that there is good cause to grant AT&T's unopposed motion.

WHEREFORE, AT&T respectfully requests that the Commission grant AT&T's motion calling for a one-week extension and order that proposed findings of fact and conclusions of law are due on January 29, 2001.

Respectfully submitted,



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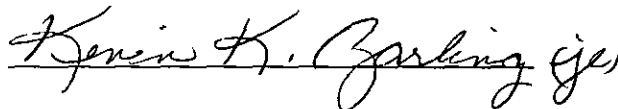
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Attorneys for AT&T Communications  
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**CERTIFICATE OF SERVICE BY MAIL**

A true and correct copy of the foregoing was served upon the parties identified on the following service list on this 16<sup>th</sup> Day of January, 2001 by U.S. Mail or hand-delivery.



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