

NEWMAN, COMLEY & RUTH

PROFESSIONAL CORPORATION

ATTORNEYS AND COUNSELORS AT LAW

MONROE BLUFF EXECUTIVE CENTER

601 MONROE STREET, SUITE 301

P. O. BOX 537

JEFFERSON CITY, MISSOURI 65102-0537

TELEPHONE: (573) 634-2266

FACSIMILE: (573) 636-3306

ROBERT K. ANGSTEAD
ROBERT J. BRUNDAGE
MARK W. COMLEY
CATHLEEN A. MARTIN
STEPHEN G. NEWMAN
JOHN A. RUTH

January 3, 2000

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

Re: Case No. TC-2000-176

Dear Judge Roberts:

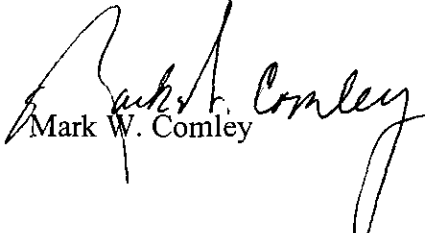
Enclosed you will find for filing with your office on behalf of Missouri Comm South, Inc. an original and fourteen copies of a Motion to Extend Time within which to Answer Data Requests.

Please call me if there are any questions. Thank you very much.

Very truly yours,

NEWMAN, COMLEY & RUTH P.C.

By:


Mark W. Comley

MWC:ab

Enclosure

cc: Office of Public Counsel
Bobby Glover
John W. Housley

FILED²
JAN 03 2000
Missouri Public
Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

JAN 03 2000

Missouri Public
Service Commission

NIXA AREA E-911 BOARD,)
)
Complainant,)
)
vs.)
)
MISSOURI COMM SOUTH, INC.)
)
Respondent.)

Case No. TC-2000-176

MOTION TO EXTEND TIME WITHIN WHICH TO
ANSWER DATA REQUESTS


Comes now Comm South Companies, Inc. d/b/a Missouri Comm South, Inc., (hereinafter "MCS" or "Respondent"), and pursuant to 4 CSR 240-2.090 (2) states the following to the Commission for its above entitled motion:

1. On December 23, 1999, the Staff of the Commission caused to be served upon Respondent a series of data information requests marked as Nos. 2601-2606.
2. The offices of the Respondent are located in the state of Texas and the distance separating Respondent and its counsel adds to the time needed to properly respond to the data information requests. Furthermore, the data information requests were served during the course of the holidays and due to the holiday schedule, Respondent has lacked its full resources by which to address the data requests within the required period of time. Finally, assembly of that data, which Respondent will be able to supply in response to the request, will require more than the twenty days allowed by Commission rule to answer data requests.
3. Respondent needs additional time to answer the data information requests and believes that it can prepare responses to the same on or before January 24, 2000, some thirty days after service of the data requests.

4. This request is not made for purposes of delaying this proceeding but for reasons of just cause.

WHEREFORE, Respondent requests the Commission to extend the time for filing objections or responses to the Staff's data requests up to and including Monday, January 24, 2000.

Respectfully submitted,

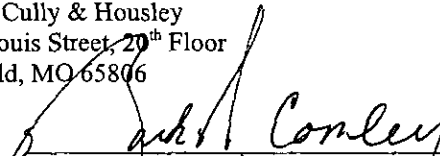
By: 
Mark W. Comley #28847
NEWMAN, COMLEY & RUTH P.C.
601 Monroe, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537
Attorneys for MISSOURI COMM SOUTH, INC.
573/634-2266 (Telephone)
573/636-3306 (FAX)

Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by U.S. Mail, postage prepaid, or hand delivered, on this 3rd day of January, 2000, to:

Office of Public Counsel
P.O. Box 7800
Jefferson City, MO 65102

John W. Housley
Lowther, Johnson, Joyner,
Lowther, Cully & Housley
901 St. Louis Street, 20th Floor
Springfield, MO 65806


Mark W. Comley