

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

In the Matter of Level 3 Communications, LLC's
Tariff Filing to Introduce Revised Tariff Pages
For Its Access Services Tariff, Mo. P.S.C. Tariff
No. 4.

Case No. TT-2011-0324
Tariff No. JX-2011-0488

**MOTION FOR EXTENSION OF TARIFF EFFECTIVE DATE
AND FOR PREHEARING CONFERENCE**

Level 3 Communications, LLC ("Level 3") hereby moves the Commission to extend the effective date of the proposed tariffs in this case another month, to August 28, 2011, in order to provide additional time for evaluation by the Staff. Level 3 further requests that the Commission set a Prehearing Conference in this matter on Monday, August 15, 2011. In support of its Motion, Level 3 states the following:

1. On March 29, 2011, Level 3 Communications, LLC filed revised tariff pages for its MO P.S.C. Tariff No. 4. They bore an "Issued" date of March 30, 2011, and an "Effective" date of March 31, 2011. On April 5, Level 3 extended the effective date to April 29, 2011. Various orders were issued and pleadings were filed by the Parties.

2. On April 27, 2011, the Commission issued its *Order Suspending Tariff and Extending Time*, suspending the effective date of the tariff to June 28, 2011. The *Order* directed Staff to file a Staff Recommendation no later than June 17, 2011.

3. On June 16, 2011, Staff filed its *Staff Report*, stating that it had held discussions with Level 3 and with AT&T Companies, but had not resolved all outstanding issues.

4. On June 17, 2011, the Commission issued its *Order Directing Filing* in this matter, directing the Parties to file a proposed procedural schedule (either jointly or separately) no later than June 24, 2011.

5. On June 21, 2011, Level 3 (after consultation with the other Parties) filed a *Motion for Extension of Tariff Effective Date and Continuance of Procedural Deadlines*. That *Motion* was granted by Order of the Commission issued on June 22, 2011, and the effective date of the proposed tariff revisions in this matter was extended to July 28, 2011.

6. On June 29 and 30, 2011, additional procedural pleadings were filed and Orders issued. On July 6, 2011, Staff filed a *Staff Report* in which it stated correctly that “Level 3 has agreed to extend its tariff effective date by another month, to August 28, 2011.” Staff further stated that it would file its Staff Recommendation in this matter no later than August 5, 2011 and recommended that a Prehearing Conference be scheduled during the week of August 15.

7. Level 3 would voluntarily extend the proposed effective date of the tariffs an additional month, until August 28, 2011. However, since the tariffs were suspended by the Commission, Commission action is required to extend the effective date.

8. Therefore, Level 3 respectfully requests that the Commission further extend the effective date of the revised tariff pages from July 28, 2011 until August 28, 2011, to allow further time for ongoing discussions in this matter.

9. In addition, consistent with the *Staff Report* of July 6, 2011, Level 3 recommends that the Commission set a Prehearing Conference in this matter on Monday, August 15, 2011.

10. Counsel for Level 3 Communications, LLC has communicated with counsel for Staff, Office of the Public Counsel and AT&T Companies. No Party objects to the proposed extension of the tariff effective date, nor does Staff or OPC object to setting the Prehearing Conference on August 15.

WHEREFORE, Level 3 Communications, LLC requests that the Commission extend the effective date of the proposed tariffs in this matter until August 28, 2011, and set a Prehearing Conference on Monday, August 15, 2011.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR LEVEL 3
COMMUNICATIONS, LLC

Dated: July 13, 2011

CERTIFICATE OF SERVICE

I hereby certify that the undersigned has caused a complete copy of the attached document to be electronically filed and served on the Commission's Office of General Counsel (at gencounsel@psc.mo.gov), the Office of Public Counsel (at opcservice@ded.mo.gov), and counsel for AT&T, on this 13th day of July 2011.

/s/ William D. Steinmeier
William D. Steinmeier