BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of dPi Teleconnect, LLC for Designation as an Eligible Telecommunications Carrier

File No. CO-2010-0054

STAFF RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned attorney, and files this *Staff Response* to dPi Teleconnect, LLC's (dPi or Company) April 7, 2010 *Response to Staff Recommendation (Response)*, respectfully stating the following:

1. On August 7, 2009, dPi filed an *Application For Designation As An Eligible Telecommunications Carrier (Application)*, requesting designation throughout certain AT&T Missouri service territories for the purpose of receiving federal universal service low income support.

2. On March 5, 2010, the Staff filed its *Staff Recommendation (Recommendation)* with attached *Memorandum*, recommending that the Commission deny dPi's August 7, 2010 *Application*, or in the alternative, allow no more than an additional thirty (30) days to remedy the deficiencies noted within the Staff's *Memorandum*. On April 7, 2010, dPi filed its *Response*.

3. Since its filing, the Staff has reviewed the Company's *Response* and tariff, and awaits the corrections to the Company's 2007 and 2008 Annual Report (AR) deficiencies. As the Staff's recommendation requires a review of the AR filings, the Staff respectfully requests for the Commission to allow until two weeks after the AR filings, or May 17, 2010, whichever is sooner, to file a recommendation or status report on dPi's *Response*.

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WHEREFORE, the Staff respectfully requests that the Commission issue an order allowing the Staff until two weeks after dPi Teleconnect, LLC's filing of corrections to its 2007 and 2008 Annual Report deficiencies, or May 17, 2010, whichever is sooner, to file a recommendation or status report on dPi's *Response to Staff Recommendation*.

Respectfully submitted,

<u>/s/ Jennifer Hernandez</u>

Jennifer Hernandez Legal Counsel Missouri Bar No. 59814

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail on Mark P. Johnson, Sonnenschein Nath & Rosenthal LLP, Attorneys for dPi Teleconnect, LLC at <u>mjohnson@sonnenschein.com</u>; and The Office of Public Counsel at <u>opcservice@ded.mo.gov</u> this 19th day of April, 2010.

<u>/s/ Jennifer Hernandez</u>