

**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) File No. TT-2011-0324
For Its Access Services Tariff, Mo. P.S.C.) Tariff No. JX-2011-0488
Tariff No. 4.)

STAFF REPORT AND REQUEST FOR ADDITIONAL TIME

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through the undersigned counsel, and reports as follows:

1. On March 29, 2011, Level 3 Communications, LLC ("Level 3") filed tariff revisions that were assigned the tariff tracking number JX-2011-0488, to which AT&T objected. After extensions and suspensions, the tariff is scheduled to take effect on July 28, 2011.

2. On June 22, 2011, The Commission issued an order extending the effective dates (by agreement of all the participants) and required the Staff to file a Recommendation as to the merits of the tariff filing no later than July 1. The Staff has had discussions with both AT&T and Level 3, and has sent Data Requests to both, which are attempting to answer as quickly as practicable. The Staff cannot address the merits of the tariff until it understands the actual mechanics of the application of the proposed tariff sheets. In addition, the Companies have provided the Staff with recent FCC decisions that deal directly with this type of matter (although, of course, does not address the specifics of Missouri law). The Staff has yet to reconcile those opinions with the unique application of §392.550.2. The Staff has yet to determine what the interplay between those opinions and the statute will be, because it is not in possession of facts necessary to make such a determination.

WHEREFORE, the Staff respectfully requests that the Commission extend the time in which the Staff must file its Recommendation on the merits until after the Companies

have responded fully to the Staff's DRs and set a Prehearing Conference at least one week prior to the Staff Recommendation date.

Respectfully submitted,



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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29th day of June, 2011.

