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

In the Matter of tw telecom of kansas city, llc )	
Tariff Filing to Implement Changes to )	File No. TT-2011-
Conform this Tariff to the Company's Current)	Tariff No. JX-2011-0512
Nationwide Access Template )	

## STAFF MOTION TO SUSPEND

COMES NOW the Staff of the Missouri Public Service Commission (Staff), through the undersigned counsel, and recommends that the Missouri Public Service Commission (Commission) suspend the proposed tariff revisions included in the tariff filing JX-2011-0512, and respectfully states the following:

- 1. On April 6, 2011, tw telecom of kansas city, llc ("the Company") filed tariff revisions that were assigned the tariff tracking number JX-2011-0512, to replace its existing Access Tariff No. 12 in its entirety. The tariff filing is presently dated to become effective on May 6, 2011.
- 2. As set forth in the attached Memorandum, the Staff has concerns that certain provisions of the proposed tariff are improper and has asked for additional explanations, which have not been provided.
- 3. The Staff suggests that the tariff filing be suspended for a period of sixty days. If the matter can be resolved more quickly, the Staff will, in its recommendation to approve the filing, ask that the suspension be lifted and the tariff filing made effective on a certain date. If the 60-day period is not sufficient, the Staff will request a further suspension.

**WHEREFORE**, the Staff respectfully requests that the Commission suspend the Company's tariff filing referred to as JX-2011-0512 for a period of sixty days.

Respectfully submitted,

Colleen M. Dale Senior Counsel Missouri Bar No. 31624 Attorney for the Staff of the Missouri Public Service Commission P. O. Box 360 Jefferson City, MO 65102 (573) 751-4255 (Telephone) cully.dale@psc.mo.gov

## **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 2<sup>nd</sup> day of May, 2011.