BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Name Change of)	
DCT Telecom Group, Inc. to)	File No. XN-2021-0054
DCT Telecom Group, Inc. d/b/a)	Tariff No. YX-2004-1457
Momentum Telecom of Ohio)	

STAFF MOTION TO EXTEND

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), through the undersigned counsel, and hereby respectfully submits this *Motion to Extend* stating:

- 1. On September 1, 2020, the above-referenced DCT Telecom Group, Inc., ("Company") filed a notice that it had changed its name to DCT Telecom Group, Inc., d/b/a Momentum Telecom of Ohio. However, the Company failed to file an adoption notice or anything addressing its currently effective tariff, YX-2004-1457.
- 2. Rule 20 CSR 4240-28.011.2 establishes filing requirements for certificated company name changes, including the provision for a company that changes its name to file either a new tariff, or a one-page adoption notice for the existing tariff, featuring the new name.
- 3. Staff has contacted the Company and it has indicated that it will file something to address the tariff. Staff asks for an extension of ten (10) business days from the filing of the Company's supplement regarding its tariff to file Staff's recommendation.

WHEREFORE, Staff prays that the Commission will permit it an extension of ten business days from the date of the Company's supplemental filing to file its recommendation; and to grant such other and further relief as it finds just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 17th day of September, 2020, to all counsel of record.

/s/ Whitney Payne