

**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 CONTINUANCE OF PROCEDURAL DEADLINES**

Level 3 Communications, LLC ("Level 3") hereby moves the Commission to extend the effective date of the proposed tariffs in this case an additional thirty (30) days, to July 28, 2011, and to continue the procedural deadlines in this case, in order to provide additional time for discussions among the Parties toward possible resolution. 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. Staff also stated that it was not recommending that the tariff be further extended. Staff stated it would file its Staff Recommendation by 10:00 a.m. on June 27, 2011.

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. As indicated in the *Staff Report* of June 16, numerous discussions have occurred concerning the proposed tariffs. Level 3 believes the continuation of these discussions could result in amicable resolution of issues relating to the proposed tariff revisions in this matter.

6. Level 3 would voluntarily extend the proposed effective date of the tariffs an additional thirty (30) days, until July 28, 2011. However, since the tariffs were suspended by the Commission, Commission action is required to extend the effective date.

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

8. In addition, the current deadlines for a Staff Recommendation and proposed procedural schedules should be continued, and an opportunity for comments on the Staff Recommendation added, as suggested below.

9. Counsel for Level 3 Communications, LLC has communicated with counsel for Staff, Office of the Public Counsel and AT&T Companies, and they do not object to this Motion.

WHEREFORE, Level 3 Communications, LLC requests that the Commission extend the effective date of the proposed tariffs in this matter until July 28, 2011, continue the deadline for the Staff Recommendation to July 1, 2011, provide for Level 3 and AT&T Companies to file comments on the Staff Recommendation by July 15, and continue the deadline for the Parties to file proposed procedural schedules to July 25, 2011.

Respectfully submitted,

/s/ William D. Steinmeier

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COUNSEL FOR LEVEL 3
COMMUNICATIONS, LLC

Dated: June 21, 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 21st day of June 2011.

/s/ William D. Steinmeier
William D. Steinmeier