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June 6, 2017

Amy L. Green
Secretary to the Commission
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Re: KCC Docket No. 17-WSLC-019-KSF

Dear Ms. Green:

Attached you will find the Motion of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility for Enlargement of Time and Amended Procedural Schedule, for electronic filing in the above referenced docket.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bruce A. Ney".

Bruce A. Ney
AVP - Senior Legal Counsel

Attachment

cc: Parties of Record

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Audit of New Cingular)
Wireless PCS, LLC d/b/a AT&T Mobility)
by the Kansas Universal Service Fund (KUSF))
Administrator Pursuant to K.S.A. 2015)
Supp. 66-2010(b) for KUSF Operating Year 19,))
Fiscal Year March 2015 - February 2016.)

Docket No. 17-WSLC-019-KSF

**MOTION OF NEW CINGULAR WIRELESS PCS, LLC D/B/A AT&T MOBILITY
FOR ENLARGEMENT OF TIME AND AMENDED PROCEDURAL SCHEDULE**

COMES NOW New Cingular Wireless PCS, LLC d/b/a AT&T Mobility ("AT&T Mobility"), pursuant to K.A.R. 82-1-217(b) and 82-1-220(c), and submits its motion to enlarge and extend the time for the completion and filing of the Audit Report in the above captioned proceeding. In support of its motion, AT&T Mobility shows the Commission as follows:

1. On August 2, 2016 the Commission issued its Order in the above captioned proceeding directing the Kansas Universal Service Fund ("KUSF") administrator, GVNW Consulting, Inc. ("GVNW"), to commence an audit of AT&T Mobility for KUSF Year 19.¹
2. The *Audit Order* directed AT&T Mobility to "assemble the information requested by GVNW so that GVNW may complete the audit and file its Audit Report with the Commission by Friday, June 30, 2017." *Audit Order* ¶ 7. Following the filing of the Audit Report, AT&T Mobility was allowed 13 days to file a response to the Audit Report and request a hearing if deemed necessary. *Id.* ¶ 8.

¹ Order to Kansas Universal Service Fund Administrator to Commence Audit of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility and Order Setting Procedural Schedule, dated Aug. 2, 2016 at ¶ 7 (hereinafter "Audit Order").

3. AT&T Mobility requests the Commission enlarge and extend the time for the completion and filing of the Audit Report by 60 days, from Friday, June 30, 2017 to Tuesday, August 29, 2017. AT&T Mobility will be allowed to file a response to the Audit Report and request a hearing, if the report is disputed, no later than 13 days from the date GVNW files the report with the Commission.

4. AT&T Mobility's request is:

a. Necessitated by internal factors that have caused unanticipated delays and difficulties in generating the reports and information requested for the audit. AT&T Mobility has attempted to keep the auditor apprised and informed of its efforts and progress, while producing the requested information to the auditor as it becomes available. However, those efforts may not allow GVNW to complete the audit by the current June 30, 2017 ordered deadline;

b. AT&T Mobility's request is made in good faith as it believes the extended time frame will be sufficient for the production of all requested information and time to respond to any follow up requests by the auditor;

c. Counsel for AT&T Mobility has discussed the need for the extension with GVNW and the Commission Staff and they do not object to AT&T Mobility's requested enlargement of time;


d. This is AT&T Mobility's first request for an extension of time in the proceeding.

5. AT&T Mobility's motion is timely filed and proper. K.A.R. 82-1-217(b) allows the Commission in its discretion to enlarge and extend the time as requested for

good cause shown. AT&T Mobility believes it has demonstrated good cause for the granting of its motion.

WHEREFORE, AT&T Mobility respectfully requests an order of the Commission enlarging and extending the time for the completion and filing of the Audit Report in the instant proceeding from Friday, June 30, 2017 to Tuesday, August 29, 2017, with AT&T Mobility allowed to file a response to the Audit Report and request a hearing, if the report is disputed, no later than 13 days from the date GVNW files the report with the Commission.

Respectfully submitted,



BRUCE A. NEY (KS#15554)

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Attorney for New Cingular Wireless PCS, LLC
d/b/a AT&T Mobility

VERIFICATION

I, Janet L. Arnold, of lawful age, and being first duly sworn, now state: I am Area Manager-External Affairs, and have read the Motion of New Cingular WirelessPCS, LLC d/b/a AT&T Mobility for Enlargement of Time and Amended Procedural Schedule, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.


Janet L. Arnold

Subscribed and sworn to before me on this 5th day of June, 2017.


Notary Public

My appointment expires:

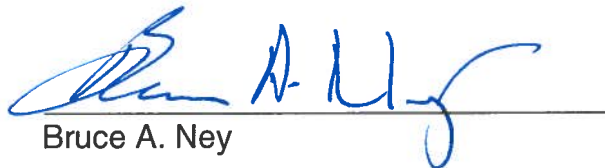


CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Motion of New Cingular Wireless PCS, LLC d/b/a AT&T Mobility for Enlargement of Time and Amended Procedural Schedule, in the captioned matter was sent via electronic mail on this 6th day of June, 2017 to:

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Bruce A. Ney