

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

Received
on

MAR 09 2012

In the Matter of Staff's Motion Requesting)
the Commission Order S & T Telephone)
Coop Association, Inc. to Submit to an)
Audit for Purposes of Determining its Cost-)
Based Kansas Universal Service Fund)
support, Pursuant to K.S.A. 66-2008.)

by
State Corporation Commission
of Kansas

Docket No. 12-S&TT-234-KSF

**MOTION TO EXTEND DATE FOR FILING
INFORMATION REQUIRED BY K.A.R. 82-1-231**

COMES NOW the S & T Telephone Cooperative Association, Inc. (S&T), by and through its attorney Colleen R. Harrell of JAMES M. CAPLINGER, CHARTERED, and respectfully moves the Commission to extend the date for filing the information required by K.A.R. 82-1-231 as previously ordered. In support of its motion, S&T shows the Commission as follows:

1. On October 7, 2011, the Staff of the State Corporation Commission of Kansas (Staff and Commission, respectively) filed its motion requesting the Commission order S&T to submit to an audit to determine whether its cost-based Kansas Universal Service Fund (KUSF) support should be adjusted, pursuant to K.S.A. 66-2008(e).

2. The Commission issued an Order on December 9, 2011 in this docket granting Staff's motion and setting forth March 15, 2012 as the date S&T must file the information required by K.A.R. 82-1-231.

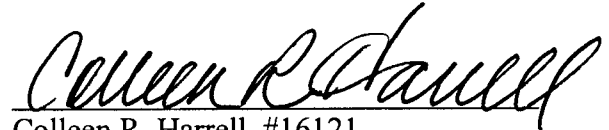
3. Kevin Kelly, of TCA, Inc., and S&T's cost consultant, has had a recent loss in his family and, as a result, has been away from the office and has been unable to work on this matter. Mr. Kelly will be the main witness prefiling testimony in support of S&T's K.A.R. 82-1-231 filing. S&T requests that because of the extraordinary and unforeseeable circumstances the Commission grant an extension to March 23, 2012 for S&T to file the information required by

K.A.R. 82-1-231. S&T's counsel contacted the Commission's Staff and Staff has no objection to S&T's request to extend the filing date to March 23, 2012. Further, S&T notes that no procedural schedule has yet been set by the Commission in this docket and, as such, an extension of only eight days will not impact or prejudice any party to this docket or any other entity.

WHEREFORE, S&T requests the Commission grant this motion for such other and further relief as the Commission deems just and proper.

Respectfully submitted,

JAMES M. CAPLINGER, CHARTERED

A handwritten signature in cursive script, reading "Colleen R. Harrell".

Colleen R. Harrell, #16121

James M. Caplinger #04738

James M. Caplinger, Jr. #11147

823 W. 10th Street

Topeka, Kansas 66612

(785) 232-0495 phone

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VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

Colleen R. Harrell, of lawful age, being first duly sworn upon oath states:

That she is the attorney for The S&T Telephone Cooperative Association, Inc. in this matter; that she has read and is familiar with the foregoing Motion to Extend Date for Filing Information Required by K.A.R. 82-1-231 and that the statements made therein are true and correct to the best of her information, knowledge and belief.

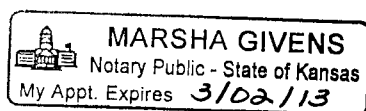

Colleen R. Harrell

Subscribed and sworn to before me this 9th day of March, 2012.


Notary Public

My appointment expires:

March 2, 2013



CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Motion to Extend Date for Filing Information Required by K.A.R. 82-1-231 was placed in the United States mail, postage prepaid, or hand-delivered this 9th day of March, 2012 to the following:

Robert A. Fox, Senior Litigation Counsel (Hand-delivered)
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027



Colleen R. Harrell

LAW OFFICES
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JAMES M. CAPLINGER
JAMES M. CAPLINGER, JR.
COLLEEN R. HARRELL

March 9, 2012

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Patrice Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604

Received
on

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In re: Docket No. 12-S&TT-234-KSF

by
State Corporation Commission
of Kansas

Dear Ms. Petersen-Klein:

We are enclosing the original and seven copies of a Motion to Extend Date for Filing Information Required by K.A.R. 82-1-231 in the above-referenced docket.

If the Commission or Staff have any questions with regard to the filing, please contact this office.

Sincerely,

JAMES M. CAPLINGER, CHARTERED


Colleen R. Harrell

CRH/mg
enclosures

cc: Steve Richards