

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

MAY 26 2006

 Docket
Room

In the Matter of Sage Telecom, Inc. Filing)
Tariff Revisions Adding a Public Switched)
Network Recovery Charge, Adding More) Docket No. 06-SAGT-1031-TAR
Plan Minutes to Specified Plans, and)
Making Rate Changes.)

**MOTION FOR EXTENSION OF TIME TO FILE
STAFF'S RESPONSE TO THE PETITION FOR RECONSIDERATION**

COMES NOW, the staff of the State Corporation Commission of the State of Kansas ("Staff" and "Commission" respectively) and moves the Commission for an order extending the time to file its Response to Citizens' Utility Ratepayer Board's ("CURB") Petition for Reconsideration. In support of its Motion, Staff alleges and states as follows:

1. On May 16, 2006, CURB filed a Petition for Reconsideration of the Commission May 1, 2006 Order. Staff's Response is due on or before Friday, May 26, 2006.
2. Due to the press of other matters, Staff requests an extension of four business days to file its Response. Counsel for CURB and Sage Telecom, Inc. were contacted and do not oppose Staff's request.

WHEREFORE, Staff moves the Commission for an order extending the time to file its Response to June 2, 2006.

Respectfully submitted,

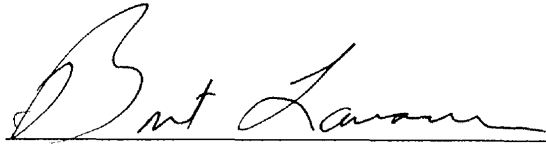


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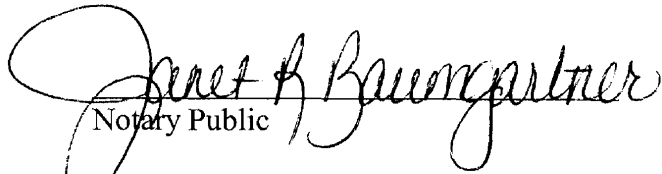
STATE OF KANSAS)
) ss.
COUNTY OF SHAWNEE)

VERIFICATION

Bret Lawson, being duly sworn upon his oath deposes and says that he is Assistant General Counsel for the Kansas Corporation Commission of the State of Kansas; that he has read and is familiar with the foregoing Motion for Extension of Time to File Staff's Response to the Petition for Reconsideration and believes that the statements therein are true to the best of his knowledge, information and belief.


Bret Lawson

SUBSCRIBED AND SWORN to before me this 26th day of May, 2006.


Notary Public

My Appointment Expires March 11, 2010

CERTIFICATE OF SERVICE

06-SAGT-1031-TAR

I, the undersigned, hereby certify that a true and correct copy of the above and foregoing Staff's Motion was placed in the United States mail, postage prepaid, or hand-delivered this 26th day of May, 2006, to the following:

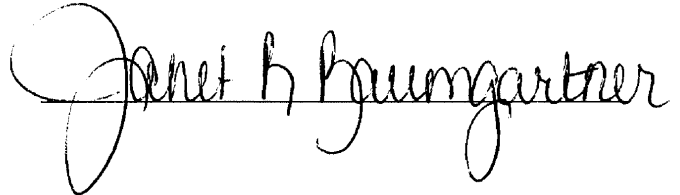
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A handwritten signature in black ink, reading "Janet H Baumgartner". The signature is written in a cursive style with a large, looping initial "J".