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April 30, 2014

Kim Christiansen Executive Director Kansas Corporation Commission 1500 SW Arrowhead Road Topeka, Kansas 66604-4027

Re: KCC Docket No. 13-CRCZ-712-KSF

Dear Ms. Christiansen:

Attached you will find *Cricket Communications, Inc.'s Motion for Enlargement of Time to File its Response to Kansas Universal Service Fund Audit Re*port for filing in the above referenced docket.

Sincerely,

Bruce A. Ney General Attorney

Attachment

cc: Parties of Record, via email

BEFORE THE STATE CORPORATION COMMISSION OF THE STATE OF KANSAS

In the Matter of the Audit of Cricket)	
Communications, Inc. by the Kansas)	
Universal Service Fund (KUSF)	j	
Administrator Pursuant to K.S.A. 2012)	Docket No. 13-13-CRCZ-712-KSF
Supp. 66-2010(b) for KUSF Operating Year)	
16, Fiscal Year March 2012 February 2013	ĺ	

CRICKET COMMUNICATIONS, INC.'S MOTION FOR ENLARGEMENT OF TIME TO FILE ITS RESPONSE TO KANSAS UNIVERSAL SERVICE FUND AUDIT REPORT

COMES NOW Cricket Communications, Inc. ("Cricket"), pursuant to K.S.A. 2013 Supp. 77-519, K.A.R. 82-1-218(d) and K.A.R. 82-1-217(b), and submits its motion for enlargement of the time in which Cricket is to file its written response to the Kansas Universal Service Fund Audit Report as required by the Commission's *Order to Kansas Universal Service Fund Administrator to Commence Audit of Cricket Communications, Inc. and Order Setting Procedural Schedule* dated May 31, 2013 in the above captioned matter. In support of its Motion, Cricket shows the Commission as follows:

Background

1. On May 31, 2013, the Commission issued its *Order to Kansas Universal Service Fund Administrator to Commence Audit of Cricket Communications, Inc. and Order Setting Procedural Schedule* [hereinafter the "*Audit Order*"] in the above captioned proceeding directing the KUSF Administrator to include Cricket in the companies selected for KUSF Operating Year 16 carrier audits. The auditor was directed to file its audit report and recommendations no later than June 30, 2014, with

Cricket to file its response, if any, no later than 13 days from the date on which the audit report is filed with the Commission. *Audit Order* at ¶ 8.

- 2. On April 17, 2014, the Kansas Universal Service Fund Audit Report on Cricket (hereinafter the "Audit Report") was filed with the Commission by the auditor. The Audit Report includes two audit findings to which Cricket believes it needs to respond for the Commission's consideration. According to the *Audit Order*, Cricket has until Wednesday, April 30, 2014, to file its response to Audit Report.
- 3. In March 2014, shortly before the filing of the Audit Report, AT&T Inc. completed and closed on its acquisition of Cricket.

Motion for Enlargement

- 4. In light of the acquisition, the new management of Cricket requires additional time to review the Audit Report and recommendations, as well as any changes being made operationally as a result of the acquisition, in order to fully, appropriately and accurately, respond to the Audit Report and the auditor's recommendations. Accordingly, Cricket respectfully requests an enlargement of the time in which it is to file its response to the Audit Report from Wednesday, April 30, 2014 to Monday, May 18, 2014.
- 5. No party will be prejudiced by the requested extension of time for Cricket to make its responsive filing. Counsel for Cricket has consulted with counsel for the Commission Staff and he has represented to Cricket that Staff has no objection to Cricket's request and motion.

6. Cricket's request for an enlargement of time is timely made; it is Cricket's first request for an enlargement of the filing period; and, Cricket's request is made in good faith. Cricket believes it has demonstrated good cause in making its request.

WHEREFORE, Cricket respectfully requests an order of the Commission granting its motion for an enlargement of the time in which it is to file its response to the Audit Report from Wednesday, April 30, 2014 to Monday, May 18, 2014.

Respectfully submitted,

BRUCE A. NEY

(#15554)

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Attorney for

Cricket Communications, Inc.

VERIFICATION

STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

I, Ann M. Hughes, of lawful age, and being first duly sworn, now state: I am

Director – Regulatory, and have read Cricket Communication, Inc.'s Motion for

Enlargement of Time to File its Response to Kansas Universal Service Fund Audit

Report, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.

Ann M. Hughes

Subscribed and sworn to before me this 30th day of April, 2014.

NOTARY PUBLIC - State of Kansas MARY A REED My Appt. Exp. 10/15/2014

Notary Public

My Appointment Expires: October 15, 2014

CERTIFICATE OF SERVICE

I hereby certify that a correct copy of Cricket Communications, Inc.'s Motion for Enlargement of Time to File Kansas Universal Service Fund Audit Response was sent via electronic mail on this 30th day of April, 2014 to:

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