

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

APR 25 2012

by
State Corporation Commission
of Kansas

In the Matter of the Complaint Against)
AT&T by Gary Ferguson.) Docket No. 12-SWBT-746-COM

**MOTION OF SOUTHWESTERN BELL TELEPHONE COMPANY
FOR ENLARGEMENT OF TIME TO FILE RESPONSE TO COMPLAINT**

COMES NOW Southwestern Bell Telephone Company d/b/a AT&T Kansas ("AT&T"), pursuant to K.A.R. 82-1-217(b) and K.A.R. 82-1-220(c), and submits its motion for enlargement of the time in which AT&T is allowed to "either satisfy the matter complained of or file a written answer" to a formal complaint filed with the Commission. In support of its motion, AT&T shows the Commission as follows:

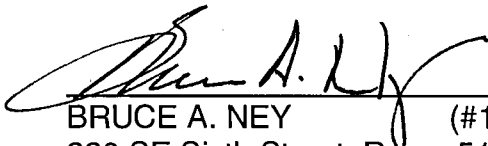
1. On April 13, 2012, Complainant Gary Ferguson ("Complainant") commenced the above captioned proceeding by filing a formal complaint against AT&T with the Commission.
2. On or about April 19, 2012, respondent AT&T's counsel was served with a copy of the complaint.
3. Pursuant to K.A.R. 82-1-217(a) and K.A.R. 82-1-220(c), AT&T calculates that it is required to either satisfy the matter complained of and/or file a written response to Complainant's complaint on or before Monday, April 30, 2012.
4. Counsel for AT&T is undertaking an investigation of the allegations of the complaint and requires additional time to complete the investigation; satisfy the Complainant's matter and/or prepare the necessary written response. Accordingly, AT&T respectfully requests an enlargement of the time in which to satisfy the matter

and/or file a written response to said complaint by ten (10) business days from Monday, April 30, 2012 to Monday, May 14, 2012.

5. AT&T's request for an enlargement of time is timely made; it is AT&T's first request for an enlargement of the response period; and, is made in good faith. AT&T believes it has demonstrated good cause in making its request.

WHEREFORE, AT&T respectfully requests an order of the Commission, pursuant to K.A.R. 82-1-217(b), granting its motion for an enlargement of the time in which to satisfy and/or file a written response to the formal complaint of Gary Ferguson, from Monday, April 30, 2012, to and including Monday, May 14, 2012.

Respectfully submitted,




BRUCE A. NEY (#15554)
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Attorney for
Southwestern Bell Telephone Company, d/b/a
AT&T Kansas

VERIFICATION

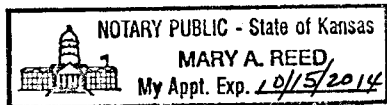
STATE OF KANSAS)
) SS:
COUNTY OF SHAWNEE)

I, Cindy Swoboda, of lawful age, and being first duly sworn, now state: I am Area Manager – Regulatory Relations, and have read the above Motion of Southwestern Bell Telephone Company for Enlargement of Time to File Response to Complaint, and verify the statements contained herein to be true and correct to the best of my knowledge and belief.



Cindy Swoboda

Subscribed and sworn to before me this 24th day of April, 2012.





Notary Public

My Appointment Expires: October 15, 2014

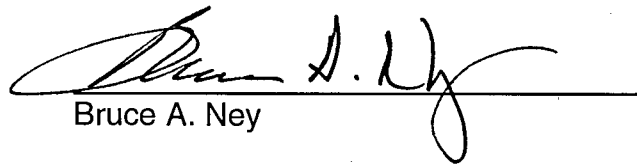
CERTIFICATE OF SERVICE

I hereby certify that a correct copy of the above Motion of Southwestern Bell Telephone Company for Enlargement of Time to File Response to Complaint was sent via U.S. Mail or hand-delivered on this 25th day of April, 2012 to:

Michael Neeley – Lead
Assistant Litigation Counsel
Kansas Corporation Commission
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Kelly Mabon – Lead
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April 25, 2012

Patrice Petersen-Klein
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, Kansas 66604-4027

Received
on

APR 25 2012

Re: KCC Docket No. 12-GIMT-746-COM

by
State Corporation Commission
of Kansas

Dear Ms. Petersen-Klein:

Enclosed you will find an original and seven copies of the Motion of Southwestern Bell Telephone Company for Enlargement of Time to File Response to Complaint, for filing in the above referenced docket.

Sincerely,

Bruce A. Ney
General Attorney

Enc.

cc: Parties of Record