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PUBLIC SERVICE  
COMMISSION

April 14, 2015

Jeff Derouen  
Executive Director  
Public Service Commission  
P.O. Box 615  
211 Sower Boulevard  
Frankfort, KY 40602-0615

Re: Application of Total Call Mobile, Inc. for Limited Designation as an Eligible  
Telecommunications Carrier  
Case No. 2014-00268

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Dear Mr. Derouen:

Please find enclosed an original and ten copies of Total Call's Motion for Extension of Time to Respond to Staff's Second Request for Information. I am also enclosing a self-addressed stamped envelope for the return of the file stamped copy. Please contact me if you have any questions about this filing.

Sincerely yours,

*Mark S Yurick by kk*

Mark S. Yurick

MSY/kk  
Enclosures

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COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

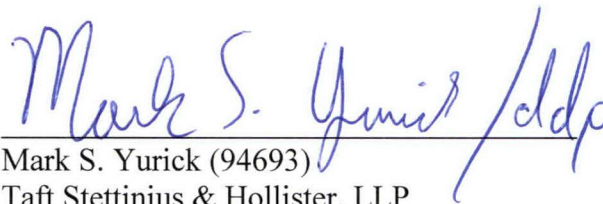
In the Matter of:

APPLICATION OF TOTAL CALL MOBILE, )	
INC. FOR LIMITED DESIGNATION AS )	CASE NO.
AN ELIGIBLE TELECOMMUNICATIONS )	2014-00268
CARRIER )	

**TOTAL CALL MOBILE, INC.'S MOTION FOR EXTENSION OF TIME TO RESPOND  
TO STAFF'S SECOND REQUEST FOR INFORMATION**

Pursuant to 807 KAR 5:001, Section 5, Total Call Mobile, Inc. ("Total Call") respectfully requests an extension of time. Total Call seeks a thirty-one (31) extension until **Monday May 18, 2015** to file responses to Commission Staff's Second Request for Information ("Staff's Second Request"). A memorandum in support of this request is below.

Respectfully submitted,



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**Counsel for Total Call Mobile, Inc.**

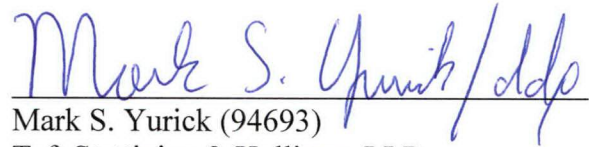
## MEMORANDUM IN SUPPORT

Pursuant to 807 KAR 5:001, Section 5, Total Call Mobile, Inc. ("Total Call") respectfully an extension of time. 807 KAR 5:001, Section 5(1) states that "[a]ll requests for relief that are not required to be made in an application, petition, or written request shall be by motion. A motion shall state precisely the relief requested." Total Call requests an extension until **Monday May 18, 2015** to file responses to Staff's Second Request. The justification for this request is provided below.

On March 19 2015, Commission Staff issued Staff's Second Request to Total Call. Total Call is diligently working to adequately and thoroughly respond to these remaining items. Some of the items requested by Staff require researching actions that have been taken by commissions in other jurisdictions. Because Total Call provides service in quite a number of jurisdictions, Total Call needs more time to accurately respond to these questions.

This short extension will not prejudice any party, and will provide Total Call adequate time to gather and file all of the information requested by Staff.

Respectfully submitted,

Handwritten signature of Mark S. Yurick in blue ink, with a horizontal line drawn across the signature.

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**Counsel for Total Call Mobile, Inc.**