October 18, 2018

To Whom It May Concern:

In its proposed rule, the IP CTS Modernization and Reform Order, 47 CFR Part 64, [Docket Nos. 13-24 and O3-123; FCC 18-79], the FCC requested comments from interested parties and stakeholders.  As you are aware, the TRS Advisory Council (Council) is tasked with advising the TRS Fund Administrator, which in turn advises the FCC, regarding the appropriateness of annual costs for the provision of TRS services to the deaf and hard of hearing community.  This is an obligation the Council takes very seriously.

Because the Council has only recently gained access to the Provider’s confidential and highly confidential cost submissions, and because the members of the Council live across the fifty states, a meeting of the subcommittee authorized under the Third Protective Order to review and analyze these submissions will not take place until November 8, 2018.  After that meeting, consultation with the Council in its entirety must take place to authorize the submission of Comments in this proceeding.

Consequently, the Council respectfully asks for an extension of time until November 20, 2018 to file comments.  We very much appreciate your consideration of our request.

Very Truly Yours,

Ron Bibler

Chairman, TRS Advisory Council