

May 23, 2018

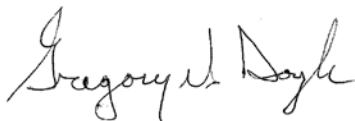
Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW, Room TW-B204
Washington, DC 20554

RE: **Joint Comments of the Minnesota Department of Commerce and Minnesota Public Utilities Commission**
WC Docket No. 18-141

Dear Ms. Dortch:

The Minnesota Public Utilities Commission and the Minnesota Department of Commerce (together, The Minnesota Agencies) respectfully submit this Request for Extension to file Comments on USTelecom's Petition for Forbearance from Section 251(c) Unbundling and Resale Requirements and Related Obligations, and Certain Section 271 and 272 Requirements, WC Docket No. 18-141, Public Notice DA 18-475, May 8, 2018.

Sincerely,



GREGORY DOYLE
Manager, Telecommunications,
Minnesota Department of Commerce

/s/ DANIEL P. WOLF
Executive Secretary,
Minnesota Public Utilities
Commission

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of USTelecom for Forbearance Pursuant to)	WC Docket No.18-141
47 U.S.C. § 160(c) to Accelerate Investment in)	
Broadband and Next-Generation Networks)	

REQUEST FOR EXTENSION OF TIME

Pursuant to 47 C.F.R. § 1.46, the Minnesota Department of Commerce and the Minnesota Public Utilities Commission (“The Minnesota Agencies”) request an extension of time in the above-captioned proceeding. Pursuant to the Commission’s Public Notice establishing dates for comments,¹ comments are due on or before June 7, 2018, and reply comments are due on or before June 22, 2018. The Minnesota Agencies respectfully request an extension of 60 days for the comments, with reply comments due 30 days later.

The proposed forbearance will affect many Minnesotans and the carriers that serve them. According to December 2016 FCC Form 477 data, which is the most current data available to the states, there were 17 competitive local service providers serving 91,252 customer lines using

¹ *Pleading Cycle Established for Comments on USTelecom’s Petition for Forbearance from Section 251(c) Unbundling and Resale Requirements and Related Obligations, and Certain Section 271 and 272 Requirements*, WC Docket No. 18-141, Public Notice DA 18-475, May 8, 2018.

unbundled network element (UNE) loops provisioned by the incumbent local exchange carriers. December 2016 Form 477 data also show that there were 43 competitive local service providers serving 104,510 customer lines through the resale of another carrier's lines. It is without question that granting the proposed forbearance petition would have a significant impact on the competitive landscape in Minnesota.

The Minnesota Agencies seek an adequate opportunity to study the impacts of the proposed forbearance by all affected entities, including the state regulatory agencies that serve to protect the public interest. The current timeframe for comments and reply comments is too short to allow for an adequate investigation. The Minnesota Agencies request an extension until August 6, 2018 for comments and September 5, 2018 for reply comments.