

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

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JUL 29 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)

Local Exchange Carriers' Rates,)

CC Docket No. 93-162 /

Much of the required data which must be accumulated is central office-specific. GTE must compile and coordinate information for 98 central offices, requiring input from personnel in several states. In addition, composite costs associated with GTE's proposed rate elements for 98 offices will have to be further disaggregated and realigned to the work functions in order to satisfy the format required by the Order.² The required realignment of work activities within functions will require recalculation of approximately 900 different rate elements. The requirement to provide overhead information for DS1 and DS3 rate elements will involve over 2300 rate elements.

The short filing schedule established by the EIS Designation Order is particularly onerous because of the timing of several other FCC proceedings. There are currently three other major tariff proceedings which require the LECs to file between August 1 and September 1, 1993: the Direct Case in response to the 1993 Annual Access Tariff Filing Designation Order,³ the Direct Case in response to the 800 Data Base Designation Order,⁴ and the tariff filing in response to the Transport Reconsideration Order.⁵ Many of the same GTE personnel and resources involved in the development

² EIS Designation Order at ¶15, n. 41-54

³ 1993 Annual Access Tariff Filings, National Exchange Carrier Association Universal Service Fund and Lifeline Assistance Rates, GSF Order Compliance Filings, Bell Operating Companies' Tariff for the 800 Service Management System and 800 Data Base Access Tariffs, CC Docket Nos. 93-193, 93-123, 93-129, Memorandum Opinion and Order Suspending Rates and Designating Issues for Investigation (DA 93-762) released June 23, 1993. (Designation Order) Direct Case was filed on July 27. Oppositions are due August 10 and Replies are due August 24, 1993.

⁴ 800 Data Base Access Tariffs and the 800 Service Management System Tariff, CC Docket No. 93-129, Order Designating Issues For Investigation (DA 93-930) (800 Data Base Designation Order) requires GTE's Direct Case to be filed August 19, 1993. Oppositions are due September 20 and Replies are due September 30, 1993.

⁵ Transport Rate Structure and Pricing, CC Docket No. 91-213, First Memorandum Opinion and Order On Reconsideration (FCC 93-366) released July 21, 1993. (Transport Reconsideration Order). Restructured local transport rates are to be filed September 1, 1993 to be effective December 1, 1993. Oppositions are due September 27 and the Reply is due October 8, 1993.

of the Direct Case in this proceeding are also involved in these three other major tariff proceedings. In addition, GTE must prepare and respond to other more routine tariff initiatives.

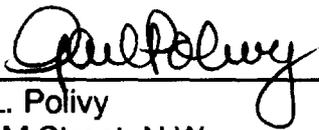
The short scheduling is further complicated by the fact that since this in the middle of the summer, many key employees have already scheduled vacations. This will drastically cut the number of personnel available to assist in preparing the Direct Case.

GTE also requests additional time to file a Reply to oppositions. The ten calendar days originally provided for the Reply is inadequate to permit a proper response. Given the detailed information required for the Direct Case, and the numerous expected oppositions, GTE would need at least 14 days to prepare a Reply. Under the current pleading cycle, oppositions are due to be filed by Friday, September 10. It is likely that GTE will not have copies of the oppositions until Monday, losing two days of the initial ten.

For the foregoing reasons, GTE respectfully requests a 45-day extension of time in which to file its Direct Case and a four-day extension in which to file its Reply.

Respectfully submitted,

GTE Service Corporation

By 
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July 29, 1993

THEIR ATTORNEY

Certificate of Service

I, Ann D. Berkowitz, hereby certify that copies of the foregoing "Motion for Extension of Time" have been mailed by first class United States mail, postage prepaid, on this 29th day of July, 1993 to all parties on the attached list.


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