

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Development of Nationwide Broadband Data to)	WC Docket No. 07-38
Evaluate Reasonable and Timely Deployment of)	
Advanced Services to All Americans, Improvement)	
of Wireless Broadband Subscribership Data, and)	
Development of Data on Interconnected Voice over)	
Internet Protocol (VoIP) Subscribership)	

REQUEST FOR WAIVER AND EXTENSION OF TIME

Southern Communications Services, Inc., d/b/a SouthernLINC Wireless ("SouthernLINC") requests a waiver and four-week extension (*i.e.*, until January 8, 2015) of the December 11, 2014 deadline to submit SouthernLINC's FCC Form 477 Local Telephone Competition and Broadband Report. SouthernLINC has encountered unforeseen difficulties in uploading its Mobile Voice Deployment shapefile onto the Form 477 filing interface. A waiver and a brief extension of the December 11 deadline serves the public interest because it would allow SouthernLINC to submit complete and accurate data to the Commission.

On at least five instances after the Federal Communications Commission (the "Commission" or "FCC") reopened its Form 477 filing interface on November 20, 2014, SouthernLINC has attempted to upload its Mobile Voice Deployment shapefile, but each time SouthernLINC has received an error message indicating that the Form 477 filing interface would not accept the shapefile. Every time, SouthernLINC reviewed its shapefile for errors and could find none. SouthernLINC also redeployed the tool it used to create new Mobile Voice Deployment shapefiles on multiple occurrences. However, subsequent attempts to upload these new files were unsuccessful. SouthernLINC has continued to attempt to upload new shapefiles, but continues to receive error messages. SouthernLINC has filed help requests with the FCC and has begun the process of evaluating the acquisition of alternative mapping software or services in order to expedite the uploading process. In addition, SouthernLINC has been in contact with FCC representatives, who have observed the issues that SouthernLINC has encountered with the

uploading process. Though SouthernLINC has continued its attempts to upload, at this time, SouthernLINC is still receiving error messages preventing it from uploading its shapefile to the Form 477 filing interface.

The Commission may grant an extension or waiver of the compliance deadline of the Form 477 for good cause.¹ Good cause is shown and an extension is appropriate if "special circumstances warrant a deviation from the general rule and such deviation will serve the public interest."² In this case, special circumstances warrant a brief extension of the December 11, 2014 deadline to file SouthernLINC's Form 477 report. As detailed above, unexpected problems with regard to uploading SouthernLINC's shapefile to the Form 477 filing interface prevents the reporting of comprehensive and accurate data regarding SouthernLINC's broadband services by the deadline. A short extension will help avoid inadvertent errors in the data submitted by SouthernLINC and, as a result, relied upon by the FCC.³

SouthernLINC acknowledges the vital importance of the information reported in Form 477 and is dedicated to submitting complete and accurate broadband data as promptly as possible. A four week extension will serve the public interest by ensuring that SouthernLINC submits accurate and complete data on the availability of broadband services.

Respectfully submitted,



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¹ 47 C.F.R. § 1.3.

² *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990); *see also WAIT Radio v. FCC*, 418 F.2d 1153 (D.C. Cir. 1969).

³ *See, e.g., Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscriberhip Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscriberhip*, Order, 24 FCC Rcd 2375 (WCB 2009) (extending the Form 477 deadline by two weeks to ensure the accuracy of the submitted data).