

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

In the Matter of	)	
	)	
Lifeline and Link Up Reform and Modernization	)	WC Docket No. 11-42
	)	
Telecommunications Carriers Eligible for Universal Service Support	)	WC Docket No. 09-197
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	

**JOINT REQUEST FOR EXTENSION OF TIME  
OF THE UNITED STATES TELECOM ASSOCIATION,  
CTIA – THE WIRELESS ASSOCIATION®, AND ITTA**

The United States Telecom Association (USTelecom)<sup>1</sup> and CTIA – The Wireless Association® (CTIA)<sup>2</sup> and ITTA – the Voice of Mid-Size Communications Companies (ITTA) (collectively “Petitioners”) respectfully request the Federal Communications Commission (Commission) to briefly extend the date for submission of comments and reply comments in the above referenced proceeding. The Commission’s Notice of Proposed Rulemaking (NPRM) seeks to make comprehensive reforms to the agency’s Lifeline program (Lifeline Reform proposal).<sup>3</sup> The due date for comments and reply comments was established in the Public Notice

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<sup>1</sup> USTelecom is the premier trade association representing service providers and suppliers for the telecom industry. Its diverse member base ranges from large publicly traded communications corporations to small companies and cooperatives – all providing advanced communications service to both urban and rural markets.

<sup>2</sup> CTIA-The Wireless Association® is an international nonprofit membership organization that has represented the wireless communications industry since 1984. Membership in the association includes wireless carriers and their suppliers, as well as providers and manufacturers of wireless data services and products. [www.ctia.org](http://www.ctia.org)

<sup>3</sup> Second Further Notice of Proposed Rulemaking, *Lifeline and Link Up Reform and Modernization*, 80 FR 40923, FCC 15-71 (released June 22, 2015) (NPRM).

released by the Wireline Competition Bureau on July 17, 2015.<sup>4</sup> Comments and reply comments are currently due on August 17, 2015 and September 15, respectively. Petitioners respectfully request a 30 day extension for comments and reply comments to September 16, 2015, and October 15, 2015, respectively.

The Commission may grant an extension of time for good cause shown.<sup>5</sup> Generally, the Commission's "criteria for granting such requests are that the extension be in the public interest, cause no harm to any party in the proceeding, and cause no significant delay. An extension of time may also be appropriate where it is shown that the matter is unusually complex and that additional time is necessary to provide the Commission with an adequate pleading."<sup>6</sup> Each of these criteria is met in the current request.

**I. The Commission's Lifeline Reform Proposal is an Unusually Complex Proceeding, and Additional Time is Warranted in Order for the Commission to Develop a Thorough Record.**

The Lifeline Reform proposal represents a significant and comprehensive effort to completely overhaul the Commission's Lifeline program. The NPRM acknowledges as much by noting that "30 years after the Lifeline program was founded, it is past time for a *fundamental, comprehensive restructuring of the program.*"<sup>7</sup> As Chairman Tom Wheeler noted in his statement accompanying the NPRM, the Commission is "taking the Lifeline program down to the studs."<sup>8</sup>

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<sup>4</sup> See Public Notice, *Wireline Competition Bureau Announces Comment Deadlines for Lifeline Reform Second Further Notice of Proposed Rulemaking*, WC Docket Nos. 11-42, 09-197, 10-90, DA 15-828 (released July 17, 2015).

<sup>5</sup> See, e.g., *Application of Media General Broadcasting of South Carolina Holdings, Inc. for Renewal of License for Station WBTW(TV), Florence, SC*, 19 FCC Rcd 24744, ¶ 3 (2004) ("For good cause shown, we will grant the requested extension of time."); see also 47 C.F.R. § 1.46.

<sup>6</sup> *Audio Enterprises, Inc.*, 3 FCC Rcd 5402, ¶ 2 (1988).

<sup>7</sup> *NPRM*, ¶ 8 (emphasis added).

<sup>8</sup> *NPRM*, Statement of Chairman Tom Wheeler, p. 1.

This major restructuring of the program is evident in the rulemaking’s identification of five major areas targeted for reform,<sup>9</sup> and 31 discrete matters on which the Commission seeks comment. The issues on which the Commission seeks comment range from expanding the scope of services eligible for support to the appropriate mechanisms for determining low-income consumer eligibility through a third-party verification system.

While each of these issues would be worthy of their own separate proceedings, the Commission has acknowledge that this comprehensive proceeding is necessary to ensure that the program operates within the “realities of the 21st Century communications marketplace,” while also advancing the statutory directive for universal service.<sup>10</sup> Moreover, the Commission must also ensure that “adequate controls are in place as we implement any further changes to the Lifeline program to guard against waste, fraud, and abuse.” Given these complexities, it is imperative that the Commission afford sufficient time for all stakeholders to better prepare a thorough, fact-based response to the Commission’s questions in the NPRM.

A broad range of stakeholders will no doubt have a strong interest in participating in this proceeding and commenting on some or all of the complex issues raised. The Commission’s Lifeline program involves stakeholders from multiple sectors in addition to communications industry members. These include consumer groups, state agencies, tribal agencies, numerous Lifeline providers, as well as the Universal Service Administrative Company (USAC).

Each of these stakeholders would benefit from the additional time afforded through

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<sup>9</sup> The five areas identified by the Commission in its *NPRM* are: 1) the Establishment of Minimum Service Standards; 2) Third-Party Eligibility Determination; 3) Increasing Competition For Lifeline Consumers; 4) Modernizing and Enhancing the Program; and 5) Efficient Administration of the Program.

<sup>10</sup> *NPRM*, ¶ 3.

grant of the extension, so that they may more fully evaluate and provide useful comments and data to the Commission. Moreover, the Commission itself will benefit from a more fully developed record. The complex nature of this proceeding coupled with the need for all stakeholders to provide fact-based responses, warrant a thirty day extension of the comment and reply comment period, and the public interest would best be served by the FCC extending the comment period to be able to collect a more fulsome fact-based record.

## **II. The Current Filing Deadline Falls During a Traditional Summer Holiday Period.**

The difficulty of creating the necessary record on the complex issues in the Commission's Lifeline Reform proceeding within the original schedule is further exacerbated by the fact that the current August 17, 2015 deadline occurs during the middle of the month where many key company staff (as well as Commission personnel) traditionally take summer vacations.

Petitioners maintain that parties need additional time to analyze the comprehensive proposals contained in the Commission's Lifeline Reform proceeding, and that parties' ability to review this material is limited by vacation schedules during the month of August. This is one of the busiest travel and vacation periods for many company personnel who will be on their long-scheduled annual vacations. These personnel include business analysts, technical staff, and legal personnel responsible for analyzing the reforms, evaluating proposals and drafting comments.

An additional extension until September 16, 2015 and October 15, 2015, will ensure that all parties have the opportunity to allocate key resources and dedicate focused efforts to providing the Commission's Lifeline Reform proceeding with the attention it deserves. Petitioners are unaware of any negative consequence that would result if the Commission extends the filing deadline until September 16, 2015.

### III. Conclusion

Given the complexity and comprehensiveness of the Commission's Lifeline Reform proposal, and the multiple stakeholders with an interest in this proceeding, the requested 30 day extension is warranted. Grant of the extension request is in the public interest, will cause no harm to any party in the proceeding, and will not result in any significant delay.

Respectfully submitted,

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