

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of

Lifeline and Link Up Reform and
Modernization, Telecommunications
Carriers Eligible for Universal Service
Support, Connect America Fund

WC Docket Nos. 11–42,
09–197,
and 10–90

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46(b) of the Commission’s Rules,¹ New America’s Open Technology Institute, Center for Democracy & Technology, Free Press, and Public Knowledge (collectively “requestors”) request a thirty-day extension of time to file Oppositions to CTIA’s Petition for Partial Reconsideration in the above-captioned proceedings, which are currently due September 17, 2015.

Comments were very recently filed pursuant to the Commission’s Second Further Notice of Proposed Rulemaking in this proceeding.² Some of the requestors filed comments, specifically raising the issue of privacy and data security.³ Because privacy and data security are subjects of discussion in comments that were already filed but were inaccessible for the past several days due to the Commission’s IT modernization efforts, and because we anticipate a number of reply comments on

¹ 47 C.F.R. § 1.46(b).

² *Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion*, Lifeline and Link Up Reform and Modernization, Telecommunications Carriers Eligible for Universal Service Support, Connect America Fund (rel. June 22, 2015).

³ See Comments of Public Knowledge at 33–34, Comments of New America’s Open Technology Institute at 18–22.

issues relevant to CTIA's petition will be filed by the September 30 deadline for replies in that proceeding, we request an extension of time to file Oppositions to CTIA's Petition for Partial Reconsideration. The requested extension, if granted, will allow interested parties to review comments and reply comments on privacy and data security.

In addition, requestors are nonprofit organizations with limited resources, many of which are also occupied by upcoming FCC- and court-imposed deadlines in a number of proceedings, including the above-captioned proceedings and Open Internet litigation. Furthermore, the current deadline for Oppositions to Petitions for Reconsideration in this proceeding falls between Rosh Hashanah and Yom Kippur, which will further limit available resources.

To allow for careful consideration of comments and reply comments that address privacy and data security, and to enable complete participation on this issue and the development of a fulsome record, we therefore request a thirty-day extension of time to file Oppositions to CTIA's Petition for Partial Reconsideration in the above-captioned proceedings, which are currently due September 17, 2015. Oppositions would be due Monday, October 19 with the requested extension.

By:

/s/ _____
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Respectfully submitted,

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