

**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
)	

**MOTION OF
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER
ADVOCATES, PUBLIC KNOWLEDGE, THE NATIONAL CONSUMER LAW
CENTER, THE GREENLINING INSTITUTE, CALIFORNIA EMERGING
TECHNOLOGY FUND, THE CENTER FOR ACCESSIBLE TECHNOLOGY,
MEDIA ALLIANCE AND CONSUMER ACTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's Rules, the National Association of State Utility Consumer Advocates ("NASUCA"),¹ Public Knowledge, The National Consumer Law Center ("NCLC"), The Greenlining Institute ("Greenlining"), The California Emerging Technology Fund ("CETF"), Center for Accessible Technology

¹ NASUCA is a voluntary association of 44 consumer advocate offices in 41 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA's members are designated by laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions as advocates for utility ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also serve utility consumers but are not created by state law or do not have statewide authority. Some NASUCA member offices advocate in states whose respective state commissions do not have jurisdiction over certain telecommunications issues.

("CforAT"), Media Alliance, and Consumer Action, collectively "Public Interest Parties," respectfully request that the Federal Communications Commission ("FCC") " grant a brief extension of time to file reply comments in response to the *Second Further Notice of Proposed Rulemaking* ("FNPRM") in the above-captioned dockets. The FNPRM was published in the Federal Register on July 17, 2015. The due date for opening comments was later extended to August 31, 2015 and the date for reply comments was extended to September 30, 2015.

Public Interest parties seek an additional 14 days for reply comments, with a due date of October 14. The issues being addressed in the broadband Lifeline NPRM are very important and very complex. The Commission received a large number of comments, most of which were not posted to the Commission's web site until the afternoon of September 2. These comments were inaccessible to parties for several days due to the Commission's IT modernization efforts.

The Public Interest Parties include nonprofit organizations with limited resources that are simultaneously working on numerous other proceedings both at the FCC and state commissions. These include reply comments addressing price cap carrier proposals for the Commission's forbearance on ETC requirements, with a due date that overlaps work on the broadband Lifeline comments.

The Public Interest Parties also note that a brief extension could facilitate stakeholder discussions on recommendations. Given the broad swathe of issues being addressed, this could allow reply comments to be more focused and provide the Commission with more useful information upon which to base its decisions. We do not believe that the request for a short extension would cause undue delay in the proceeding.

The Public Interest Parties therefore respectfully request that the time for submission of reply comments be extended until October 14, 2015 for all parties.

September 17, 2015

Respectfully submitted,

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