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September 21, 2015

Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Motion of the National Association of State Utility Consumer Advocates et al. for Extension of Time; WC Docket Nos. 11-42, 09-197, 10-90

Dear Ms. Dortch:

The Lifeline Joint Commenters (Joint Commenters),¹ by and through the undersigned counsel, write in support of the Public Interest Parties'² request that the Federal Communications Commission (Commission) grant interested parties a brief extension of time to file reply comments in response to the Commission's Second Further Notice of Proposed Rulemaking (Second FNPRM) in the above-captioned dockets.³

Joint Commenters agree with the Public Interest Parties that a 14-day extension of time—until October 14, 2015—is appropriate in this case. The Commission received a large number of lengthy initial comments to its Second FNPRM, including Joint Commenters' own 97-

¹ The Lifeline Joint Commenters include Blue Jay Wireless, LLC, i-wireless LLC, Telrite Corporation (collectively, the Lifeline Connects Coalition), and American Broadband & Telecommunications Company, Assist Wireless, LLC, Easy Telephone Services Company d/b/a Easy Wireless, Prepaid Wireless Group LLC, TAG Mobile, LLC, Telscape Communications, Inc./Sage Telecom Communications, LLC (d/b/a TruConnect) and Total Call Mobile, Inc.

² The Public Interest Parties include the National Association of State Utility Consumer Advocates, Public Knowledge, the National Consumer Law Center, the Greenlining Institute, the California Emerging Technology Fund, the Center for Accessible Technology, Media Alliance, and Consumer Action.

³ See *In the Matter of Lifeline and Link Up Reform and Modernization, et al.*, WC Docket Nos. 11-42, 09-197, 10-90, Motion of the National Association of State Utility Consumer Advocates et al. for Extension of Time (Sept. 17, 2015); 47 C.F.R. § 1.46.

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page submission. The initial comments address a wide variety of important and complex issues, the resolution of which could have a significant impact on eligible telecommunications carriers (ETCs), low-income consumers, and the Lifeline program as a whole for years to come. Compounding the volume and complexity of the comments filed in the initial round is the fact that commenters were unable to access the Commission's Electronic Comment Filing System (ECFS) for the better part of a week after initial comments were submitted.

In order to give all parties an opportunity to fully reply to the initial round of comments and to develop a robust record in this proceeding, Joint Commenters support the Public Interest Parties in calling for a 14-day extension of the reply comment deadline until October 14, 2015.

Respectfully submitted,



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