Before the

Federal Communications Commission

Washington, D.C. 20554

In the Matter of	)	
	)	
Special Access for Price Cap Local Exchange Carriers	)	WC Docket No. 05-25
	)	
	)	
	)	
AT&T Corporation Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services	)	RM-10593

MOTION OF THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES AND THE MARYLAND OFFICE OF PEOPLE'S COUNSEL FOR EXTENSION OF TIME FOR REPLY COMMENTS

Pursuant to Section 1.46 of the Commission's Rules, the National Association of State Utility Consumer Advocates ("NASUCA")[1] and the Maryland Office of People's Counsel respectfully request that the Federal Communications Commission ("FCC")

[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.

grant a brief extension of time to file reply comments at this stage in response to the *Further Notice of Proposed Rulemaking* ("FNPRM") in the above-captioned dockets.[2] As noted, the FNPRM was first published in the Federal Register in 2012. For reasons mostly having to do with data collection, initial comments on the FNPRM were ultimately not due until January 22, 2016.[3] On January 22, however, the District of Columbia suffered blizzard conditions, and the FCC closed. On this account, the due date for initial comments was extended to January 28, 2016.[4] The due date for reply comments was not extended, however.

The six-day extension[5] cut into the 28-day period for reply comments. Now there are only 22 days for reply. That is unreasonable.

NASUCA and the Maryland People's Counsel seek an additional 14 days for reply comments, with a due date of March 6, 2016.[6] The issues being addressed in the FNPRM are very important and very complex. The volume of initial comments the Commission received was large. And there are complex confidentiality claims to address. Under these circumstances, the Commission should allow the extension.

NASUCA and the Maryland People's Counsel therefore respectfully request that the time for submission of reply comments be extended until March 6, 2016 for all

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[2] *Special Access for Price Cap Local Exchange Carriers; AT&T Corp. Petition for Rulemaking to Reform Regulation of Incumbent Local Exchange Carrier Rates for Interstate Special Access Services*, WC Docket No. 05-25, RM-10593, Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 16318 (2012) (*Data Collection Order* or *Special Access FNPRM*), Section IV.B, paras. 80-90.
[3] See DA 15-1473, https://apps.fcc.gov/edocs_public/attachmatch/DA-15-1473A1.pdf.
[4] See DA 16-92 http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0127/DA-16-92A1.pdf.
[5] The initial comments were not all available on the Commission's ECFS until January 29.
[6] The fourteenth day falls on a Saturday, making the due date Monday, March 6.

parties.

Respectfully submitted,

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