

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Implementation of the Local Competition)
Provisions in the Telecommunications Act)
of 1996)
)
Interconnection between Local Exchange)
Carriers and Commercial Mobile Radio)
Service Providers)

CC Docket No. 96-98

CC Docket No. 95-185

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MOTION FOR EXTENSION OF TIME
OF THE
UNITED STATES TELEPHONE ASSOCIATION

The United States Telephone Association ("USTA"), pursuant to Section 1.46 of the Commission's regulations, files this Motion to extend the period for all interested parties to file reply comments in the above-referenced proceedings. USTA is the principal trade association of the incumbent local exchange carrier ("ILEC") industry.

USTA respectfully requests a 20-day extension of time to file reply comments, which are currently due June 10. As proposed by USTA, reply comments would be filed on June 30. A 20-day extension of time is warranted given that at least 65 parties filed comments in this proceeding on May 26, with many parties filing comments of substantial length. The current schedule for filing reply comments will not permit interested parties to adequately review and respond to the voluminous comments filed. It is critically important to the future of competition in the telecommunications marketplace that the Commission has a complete record of facts, data, and information to reach a decision in this proceeding that takes into account the facts presented and applies

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Section 251(d)(2) necessary and impair standards in a manner that conforms with the Supreme Court's opinion in *AT&T v. Iowa*.¹

USTA's request is reasonable and consistent with Commission precedent. In granting a 45-day request for extension of time to file comments, the Commission concluded:

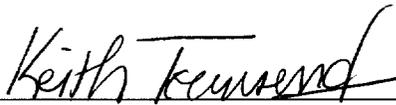
... we recognize that some additional time is warranted to permit ... carriers to prepare comprehensive responses to assist the Commission in achieving a fair and just decision.²

Based upon the large number of comments filed, the importance of the Commission's deliberations to competition in the telecommunications industry, and consistent with prior Commission precedent, USTA respectfully requests a 20-day extension of time, until June 30, for all interested parties to file reply comments.

Respectfully submitted,

UNITED STATES TELEPHONE ASSOCIATION

May 27, 1999



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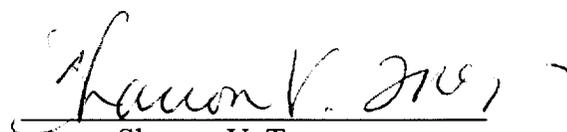
Its Attorneys

¹ *AT&T Corp. v. Iowa Utilities Bd*, 119 S. Ct. 721 (1999).

² *In the Matter of Prescribing the Authorized Unitary Rate of Return for Interstate Services of Local Exchange Carriers*, CC Docket No. 98-166, *Order granting Motion for Extension of Time* at 2, ¶13 (released November 16, 1998).

CERTIFICATE OF SERVICE

I, Sharron V. Turner, do certify that on May 27, 1999 copies of the foregoing Motion was deposited in the U.S. Mail, first-class, postage prepaid to the parties filing in this proceeding


Sharron V. Turner
Sharron V. Turner