

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)

Access Charge Reform;)

Price Cap Performance Review)

for Local Exchange Carriers;)

Low-Volume Long Distance Users;)

Federal-State Joint Board On Universal Service)

CC Docket No. 96-262

CC Docket No. 94-1

CC Docket No. 99-249

CC Docket No. 96-45

**THE PUBLIC UTILITIES COMMISSION OF OHIO'S MEMORANDUM IN
SUPPORT OF THE NATIONAL ASSOCIATION OF REGULATORY UTILITY
COMMISSIONERS' REQUEST TO EXTEND THE TIME FOR FILING
COMMENTS**

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THE PUBLIC UTILITIES COMMISSION OF OHIO SUPPORTS NARUC'S REQUEST TO EXTEND THE COMMENT CYCLE

Pursuant to Sections 1.46 and 1.44 of the Federal Communication Commission's ("FCC" or "Commission") General Rules of Practice and Procedure, 47 C.F.R. Sections 1.46 and 1.44 (1999), the National Association of Regulatory Utility Commissioners ("NARUC") has requested that the Commission extend the time for filing comments in these proceedings an additional fourteen (14) days to November 12, 1999 for initial comments and to December 3, 1999 for Replies. The Public Utilities Commission of Ohio (Ohio Commission) supports NARUC's request for an extension.

The Ohio Commission agrees with NARUC that the Coalition for Affordable Local and Long Distance Services (CALLS) proposal clearly raises a host of issues of direct and critical concern to State commissions. As such, and given the timing of NARUC's annual convention, a brief extension of the comment cycle in this docket is eminently reasonable. The Ohio Commission agrees with NARUC that the comments in this docket be extended until after the NARUC annual convention, so that the NARUC members can meaningfully discuss the issues raised by the CALLS proposal. Moreover, the Ohio Commission submits that the timing of the FCC's scheduled decision in the Universal Service docket (CC Docket 96-45) also independently warrants an extension of the comment cycle in this docket. In particular, the Ohio Commission submits that the FCC's expected Universal Service decision needs to be examined and considered in the context of the significant Universal Service implications of the CALLS proposal. Clearly, the

FCC's Universal Service decision must be assimilated and understood prior to any additional Universal Service reforms being considered.

CONCLUSION

For the foregoing reasons, the Ohio Commission respectfully requests that the FCC grant NARUC's request to extend the comment cycle in this docket.

Respectfully submitted,

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