

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Access Charge Reform)	CC Docket No. 96-262
)	
Price Cap Performance Review for Local Exchange Carriers)	CC Docket No. 94-1
)	
Low-Volume Long Distance Users)	CC Docket No. 99-249
)	
Federal-State Joint Board On Universal Service)	CC Docket No. 96-45
)	

**COALITION FOR AFFORDABLE LOCAL
AND LONG DISTANCE SERVICE RESPONSE TO
REQUEST FOR EXTENSION OF TIME**

The Coalition for Affordable Local and Long Distance Service ("CALLS") hereby responds to the request of the National Association of Regulatory Commissioners ("NARUC") for an extension of time to file comments with respect to the Notice of Proposed Rulemaking released on September 15, 1999 by the Commission in the above-captioned proceedings. Although CALLS does not object to the Commission granting leave for NARUC, any state public utility commissions, NASUCA, or state public utility advocates to file comments on or before November 12, 1999, in order to accommodate upcoming conventions of NARUC and NASUCA, CALLS requests that the Commission maintain the original pleading cycle for all other commenters.

The CALLS Proposal presents a unique opportunity for the Commission to resolve for the next five years a set of complex, interrelated interstate universal service and access charge reform issues. These issues have remained unresolved in the nearly four years since enactment of the Telecommunications Act of 1996. The public interest will benefit significantly by

adoption of the CALLS Proposal, by providing an absolute assurance of affordable interstate rates in rural areas, explicit and pro-competitive universal support for service to residential and rural areas, strong protections for low-income consumers, and a rate structure that will be consistent with product and service package innovation and the emergence of Internet.

Time continues to be of the essence in consideration of the CALLS proposal. The proposal itself was developed and agreed upon for implementation in early 2000, to accommodate Y2K implementation. Unless the proposal is adopted in time for early 2000 implementation, the unique opportunity to resolve these issues could be lost, including the plan's substantial public interest benefits.

Accordingly, CALLS respectfully requests that the Commission not grant a general extension of the comment period, but grant NARUC, NASUCA and their members leave to file comments by November 12, 1999. This would accommodate the legitimate needs of state and state utility advocates, but still permit expeditious development of the record with respect to the CALLS proposal.

Respectfully submitted,

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