

# 1234

July 25, 2000

Magalie Roman Salas  
Secretary  
Federal Communications Commission  
455 12 Street N.W.  
Washington, DC 20554

**RE: CC Dockets no. 96-262, 94-1, 99-249, and 96-45**

Citizens Communications Company (Citizens) hereby makes motion for an extension of time to take action on the requirements of FCC 00-193, paragraph 61 of the Commission's Order on CALLS. Paragraph 61 provides Price Cap companies the option to accept or reject the CALLS plan within 60 days of the Order released May 31, 2000.

Citizens is requesting an additional 60-days to evaluate, consider and decide whether to continue under the CALLS plan or fall under the FCC's alternative price cap regulatory plan. This is critical decision that

Sixty days from the date of the Order is not enough time to fully evaluate and consider completely the ramifications of the CALLS opt-in, opt-out decision. Since the release of the May 31 Order significant work has been required to bring effect to the new access reform requirements. Activities are on-going related to these new requirements and they include the following:

1. Process, file and implement the 2000 Annual Price Cap filing that implemented the mandatory aspects of the CALLS plan
2. Respond to Commission and others with questions and concerns on the 2000 Annual Price Cap filing

3. Evaluate the final results of the 2000 Annual Price Cap filing
4. Conduct the analysis and make decisions pertaining to the opt-in, opt-out requirements for existing properties
5. Conduct the research, data development, and evaluations pertaining to opt-in, opt-out for newly acquired properties

This extension will provide Citizens enough time to completely evaluate the CALLS decision. Citizens is in the process of acquiring exchanges from Qwest and Verizon, the majority of which have not closed. The 60-day extension will enable Citizens to gather the appropriate cost data and incorporate the cost characteristics of the acquired properties into Citizens existing cost structure, an indispensable step in making a decision whether to accept or reject the application of CALLS.

All correspondence and inquiries regarding with this filing should be addressed to me at 5600 Headquarters Drive, Plano, TX 75024; telephone 469-365-3375 or fax 469-365-4120.

Sincerely,

Michael J. Shultz  
Director Regulatory Costing & Pricing

cc: R. Lerner, FCC  
A. Goldschmidt, FCC  
T. Priess, FCC  
R. Tettelbaum, Citizens