

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

In the Matter of)	
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	

**MOTION FOR EXTENSION OF TIME
OF THE
UNITED STATES TELECOM ASSOCIATION**

The United States Telecom Association (USTA) respectfully submits a motion for extension of time to file reply comments in the above referenced proceeding.¹ USTA believes that given the broad ranging and complex nature of the issues raised by the commenting parties, an additional forty-five days is required to prepare reply comments. Therefore, USTA moves that the date for filing reply comments be extended from October 5, 2001 to November 19, 2001.

The FCC is well aware of the fundamental changes at stake in this proceeding. While the NPRM was relatively short, the proposals to modify and/or replace current intercarrier compensation mechanisms with bill and keep or other alternatives have far reaching implications for regulators, carriers, manufacturers, investors, employees and consumers. As USTA noted in its comments, changing the methods and revenue flows associated with the current intercarrier compensation structures, whether as a result of market forces or as a result of FCC action, will bring about a dramatic redistribution of traffic revenues and shifts of cost recovery responsibilities among carriers, consumers, services and locations. This will result in widespread consequences, many of which will be welcome although major and unwanted dislocations may occur due to the size and reach of the financial impact of the change. Careful analysis must be

¹ USTA is the nation's oldest trade association for the local exchange carrier (LEC) industry. USTA represents more than 1,200 telecommunications companies worldwide that provide a full array of voice, data and video services over wireline and wireless networks.

undertaken before any change can be implemented. The commenting parties also recognize the substantial impact of this proceeding. Approximately ninety parties have filed voluminous pages of comments raising a myriad of issues for consideration by the FCC. It is unquestionable that the issues are complex. Some parties have included economic analyses that will require expert review before parties can begin to prepare comprehensive replies. There is simply not enough time to analyze and respond given the scope and importance of the issues presented. And, planned meetings to address the comments have been cancelled due to the tragic events of the past week.

USTA does not believe that the additional time requested will harm any of the commenting parties. Accordingly, USTA moves that the FCC extend the period for filing reply comments in this proceeding for an additional forty-five days.

Respectfully submitted

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