

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

In the Matter of	)	
	)	
Performance Measurements and Standards for Interstate Special Access	)	CC Docket No. 01-321
	)	
Petition of U S West, Inc., for a Declaratory Ruling Preempting State Commission Proceedings To Regulate U S West's Provision of Federally Tariffed Interstate Services	)	CC Docket No. 00-51
	)	
Petition of Association for Local Telecommunications Services for Declaratory Ruling	)	CC Docket Nos. 98-147, 96-98, 98-141
	)	
Implementation of the Non-Accounting Safeguards of Sections 271 and 272 of the Communications Act of 1934, as amended	)	CC Docket No. 96-149
	)	
2000 Biennial Regulatory Review - Telecommunications Service Quality Reporting Requirements	)	CC Docket No. 00-229
	)	
AT&T Corp. Petition to Establish Performance Standards, Reporting Requirements, and Self-Executing Remedies Need to Ensure Compliance by ILECs with Their Statutory Obligations Regarding Special Access Services	)	RM 10329

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

The United States Telecom Association (USTA), pursuant to Section 1.46 of the Commission's regulations, respectfully files this Motion to extend the period for all interested parties to file comments in the above-referenced proceeding. 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. USTA's members seek a limited extension of the time to file comments and reply comments to January 29, 2002 and February 19, 2002, respectively.

The current dates for filing comments and reply comments in this proceeding were established by publication of a Notice of Proposed Rulemaking (NPRM) in the *Federal Register* at 66 FR 63651 (rel. Dec. 10, 2001 ). The current schedule does not provide an adequate opportunity for USTA's members to consider the issues raised in this NPRM, since company resources must also be devoted to considering and developing positions regarding the Commission's proposal to implement performance measures and standards for unbundled network elements (UNEs) and interconnection. Given the complexity and the sheer number of issues presented in the UNE Measurements and Standards NPRM, the Commission granted USTA's request for an extension of time in that proceeding to allow USTA's broad-based membership to consider those issues.<sup>1</sup> Many of the personnel involved in the UNE proceeding will also be involved in this proceeding. The current filing schedule will make it difficult for USTA members to develop a response for both. Therefore, USTA requests that the Commission permit a limited extension of the date for filing comments from January 9, 2002 to January 29, 2002 and the date for filing reply comments from January 30, 2002 to February 19, 2002.

An extension of time for filing comments will not prejudice the interests of other parties, but would permit all parties an opportunity to provide a complete record that will assist the Commission in achieving a fair and just decision.

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<sup>1</sup> Performance Measurements and Standards for Unbundled Network Elements and Interconnection, Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, Deployment of Wireline Services Offering Advanced Telecommunications Capability, Petition of Association for Local Telecommunications Services for Declaratory Ruling, CC Docket Nos. 01-318, 98-56, 98-147, 96-98 and 98-141, *Order*, (rel. Dec. 7, 2001).

For the reasons discussed above, USTA respectfully requests that the Commission grant this Motion for an extension of time for all interested parties to file comments on January 29, 2002 and reply comments on February 19, 2002 in this proceeding.

Respectfully submitted,

**UNITED STATES TELECOM ASSOCIATION**

By: /s/ Linda Kent

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