

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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|---|---|----------------------|
| In the Matter of |) | |
| |) | |
| Federal-State Joint Board on |) | CC Docket No. 96-45 |
| Universal Service |) | |
| |) | |
| 1998 Biennial Regulatory Review - |) | CC Docket No. 98-171 |
| Streamlined Contributor Reporting |) | |
| Requirements Associated with |) | |
| Administration of Telecommunications |) | |
| Relay Service, North American Numbering |) | |
| Plan, Local Number Portability, and |) | |
| Universal Service Support Mechanisms |) | |
| |) | |
| Telecommunications Services for |) | CC Docket No. 90-571 |
| Individuals with Hearing and Speech |) | |
| Disabilities, and the Americans with |) | |
| Disabilities Act of 1990 |) | |
| |) | |
| Administration of the North American |) | CC Docket No. 92-237 |
| Numbering Plan and North American |) | NSD File No. L-00-72 |
| Numbering Plan Cost Recovery |) | |
| Contribution Factor and Fund Size |) | |
| |) | |
| Number Resource Optimization |) | CC Docket No. 99-200 |
| |) | |
| Telephone Number Portability |) | CC Docket No. 95-116 |
| |) | |
| Truth-in-Billing and Billing Format |) | CC Docket No. 98-170 |

REQUEST OF VERIZON¹ FOR EXTENSION OF TIME

Verizon hereby requests a three week extension of the deadline for filing comments to the Further Notice of Proposed Rulemaking and Report and Order in the above-captioned proceeding, and a five week extension for filing replies. Granting this

¹ The Verizon telephone companies (“Verizon”) are the local exchange carriers affiliated with Verizon Communications Inc., and are listed in Attachment A.

request would be in the public interest, as it would allow commenters to conduct more in-depth analysis of the complex issues raised in the NPRM. In addition, the new proposed deadlines (May 3, 2002 for comments, June 3, 2002 for replies), would align the due dates with the comments in the related *Wireline Broadband NPRM*, allowing commenters to analyze these issues simultaneously.

The Commission recently granted a limited extension of time for comments and replies to the *Wireline Broadband NPRM*, a proceeding involving the universal service obligations of broadband providers, because of “the complexity of the issues and the Commission’s desire to obtain accurate and complete data.”² The issues related to the NPRM in this proceeding – including a potential overhaul of the method of contribution to universal service – are just as complex, if not more so. The change from a revenue-based system to a per-connection charge that has been proposed by AT&T, WorldCom, and others, likely would have dramatic effects on LECs, IXC, and wireless providers, and its potential impact on customers is largely unknown.

Verizon needs the extension of time in order to analyze the per-connection proposal, both in terms of how it would be implemented, and the potential impact it would have on different classes of customers. In addition, the Commission should grant a longer extension of the reply date, because the current time between the comment and reply cycle (only slightly more than two weeks) is not sufficient to allow for commenters to analyze and respond to the numerous comments that undoubtedly will be filed in this

² See Order, *In the Matter of Appropriate Framework for Broadband Access to the Internet over Wireline Facilities; Universal Service Obligations of Broadband Providers; Computer III Further Remand Proceedings: Bell Operating Company Provision of Enhanced Services; 1998 Biennial Regulatory Review – Review of Computer III and ONA Safeguards*, CC Docket No. 02-33, DA 02-704 ¶ 2 (rel. March 22, 2002).

proceeding. Granting the extension would be in the public interest, as it likely will allow for a more complete public record. Because the proposed extension is short, it will not prejudice any parties.

Conclusion

The Commission should grant a limited extension of time until May 3, 2002 for filing comments, and June 3, 2002 for filing replies, on the Further Notice of Proposed Rulemaking and Report and Order in the above-captioned proceeding.

Respectfully submitted,



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April 2, 2002

THE VERIZON TELEPHONE COMPANIES

The Verizon telephone companies are the local exchange carriers affiliated with Verizon Communications Inc. These are:

Contel of the South, Inc. d/b/a Verizon Mid-States
GTE Midwest Incorporated d/b/a Verizon Midwest
GTE Southwest Incorporated d/b/a Verizon Southwest
The Micronesian Telecommunications Corporation
Verizon California Inc.
Verizon Delaware Inc.
Verizon Florida Inc.
Verizon Hawaii Inc.
Verizon Maryland Inc.
Verizon New England Inc.
Verizon New Jersey Inc.
Verizon New York Inc.
Verizon North Inc.
Verizon Northwest Inc.
Verizon Pennsylvania Inc.
Verizon South Inc.
Verizon Virginia Inc.
Verizon Washington, DC Inc.
Verizon West Coast Inc.
Verizon West Virginia Inc.