

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

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In the Matter of	)	
	)	
AT&T Corp.	)	
	)	
Petition for Rulemaking to Reform Regulation	)	RM No. 10593
of Incumbent Local Exchange Carrier Rates	)	
for Interstate Special Access Services	)	
_____	)	

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the Competitive Telecommunications Association ("CompTel") files this Motion requesting the Commission to extend the period for all interested parties to file reply comments in the above-captioned proceeding from December 23, 2002 to January 23, 2003. CompTel submits that this brief extension of time would permit more substantive and complete responses on the complex economic and factual issues raised in this proceeding. Further, this modest extension would not prejudice any interested parties.

AT&T filed a Petition for Rulemaking on October 15, 2002, asking the Commission to reform and to re-establish rate regulation of the incumbent local exchange carriers' ("LECs") special access services. The Commission issued a Public Notice (DA 02-2913) on October 29, 2002, establishing a pleading cycle on the Petition. The Public Notice requires that comments be filed by December 2, 2002, and reply comments by December 23, 2002.

On December 2, CompTel and other parties filed comments. Many parties filed voluminous comments, including testimony by economists and other supplemental evidentiary submissions. Moreover, the reply comment schedule established by the Commission impinges upon the upcoming holiday season. As a result, many parties, particularly smaller entities, may not be able to muster the resources to adequately respond in the time period allotted. Even for some of the larger parties in this proceeding, personnel with the expertise necessary to fully address the complex economic and factual issues raised in the comments will be on scheduled leave and hence unavailable. This is no doubt true not only for CompTel but also for other parties that may wish to file reply comments. In light of the large volume of comments that have been filed and the complexity of the issues, the short period between December 2 and 23 is inadequate to permit CompTel and others to provide the Commission with a full, informed reply. A brief extension of time until January 23, 2003, would greatly facilitate the development of a complete record for the Commission's review.

No prejudice to any party would result from this modest extension. The parties filing comments have had almost two months in which to review and respond to AT&T's Petition, which was filed on October 15, 2002. The Commission has previously granted requests for extensions in similar circumstances. *See, e.g., Performance Measurements and Standards for Interstate Special Access Services*, Order, 16 FCC Rcd. 22,117 (2001); *Performance Measurements and Standards for Unbundled Network Elements and Interconnection*, Order, 16 FCC Rcd. 21,428 (2001). CompTel respectfully submits that in this proceeding as well, grant of the additional time requested would allow all interested parties a meaningful opportunity to respond to issues raised in the comments, and would assist the Commission in reaching its decision based on a complete record.

For all of these reasons, CompTel respectfully requests that the Commission grant its motion for an extension of time until January 23, 2003, to file reply comments in this proceeding.

Respectfully submitted,

A handwritten signature in black ink, reading "Jonathan D. Lee". The signature is written in a cursive style with a large initial 'J' and 'L'.

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Jonathan D. Lee  
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The Competitive Telecommunications  
Association  
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Tel: (202) 296-6650

December 4, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that on this 4th day of December, 2002, I caused true and correct copies of the forgoing Motion for Extension of Time to be served on parties listed below by electronic filing.

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

A handwritten signature in black ink, reading "Jonathan D. Lee". The signature is written in a cursive style with a large initial 'J' and 'L'.

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Jonathan D. Lee