

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

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

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s rules, 47 C.F.R. § 1.46, the Ad Hoc Telecommunications Users Committee, AT&T Corp., e-commerce & Telecommunications Users Group (“eTUG”), Level 3 Communications, LLC and WorldCom, Inc. (collectively, “Parties”), hereby move to extend the time for filing comments and reply comments in the above-captioned proceedings. Specifically, the Parties request that the date for filing comments be extended to

February 28, 2003 and the date for reply comments be extended to April 18, 2003. As explained below, extending the date for initial comments would allow the Parties adequate time to analyze the various proposals outlined in the Second Further Notice of Proposed Rulemaking (“*Second Notice*”).¹ Extending the date for replies would not only assist the Parties and others in reviewing and responding to the initial round of comments, but also enable commenters to report on their initial experience in implementing the interim changes to its universal service rules that the Commission adopted in December. In short, the requested relief clearly would further the Commission’s efforts to develop the record in this proceeding needed to enact long-term reforms to its mechanism for assessing and recovering contributions to its universal service programs.

On December 13, 2002, the Commission released the *Second Notice* in which it adopted interim measures aimed at maintaining the viability of the universal service fund (“USF”), including (1) revising the USF contribution mechanism to require carriers to contribute to the fund based on their *projected* – rather than historical – interstate and international end-user revenues; and (2) increasing the wireless safe harbor from 15% to 28.5%. The Commission sought comment on whether these modifications to the revenue-based methodology would be sufficient to ensure the future viability of universal service. It also outlined and invited parties to comment on a number of alternative approaches to assessing USF contributions, including (1) a

¹ *Federal-State Joint Board on Universal Service; 1998 Biennial Regulatory Review – 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 Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size; Number Resource Optimization; Telephone Number Portability; Truth-in-Billing and Billing Format*, CC Dockets No. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, and 98-170, and NSD File No. L-00-72, Report and Order and Second Further Notice of Proposed Rulemaking (rel. Dec. 13, 2002) (FCC 02-329) (“*Second Notice*”).

connections-based methodology with a mandatory minimum obligation; (2) a connections-based mechanism that would split the universal service fee between switched transport and access providers; and (3) an approach that used North American Numbering Plan telephone numbers to assess contributions. The Commission also asked commenters to address the potential effects of the different methodologies on residential consumers, and whether the typical customer would pay more, less, or approximately the same in USF fees as it would pay today. Based on the date that the *Second Notice* was published in Federal Register,² comments currently are due on January 29 and replies on February 28, 2003.

As summarized above, the *Second Notice* presents several different possible approaches to reforming the current system. Some were not expressly addressed in prior notices, and others involve significant modifications to proposals previously considered. The Parties believe that in either case, a careful analysis of the proposals, their consistency with the statutory requirements, and, where possible, an assessment of their likely impacts will require more time than the existing pleading cycle permits.

In addition, the *Second Notice* asks parties to comment on the effectiveness of the modifications to the revenue-based system that were adopted in December. Although the Parties previously have identified flaws in the revenues-based approach to assessment that were not rectified by the interim rules, extending the date for replies in this proceeding will provide an opportunity for parties to comment on their initial experience under the revised rules, the full effect of which will not be known until April 1, 2003, when providers begin to collect and contribute USF fees on the basis of projected revenues. The Parties, therefore, ask that the reply date be extended to provide commenting parties adequate time not only to evaluate the initial

² 67 Fed. Reg. 79,525 (Dec. 30, 2002).

