

**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,¹ AT&T Corp. and WorldCom, Inc., hereby move to extend the time for filing comments and reply comments on the Staff Study in the above-captioned proceedings.² Specifically, AT&T and WorldCom request that the date for

¹ 47 C.F.R. § 1.46.

² See Public Notice, *Commission Seeks Comment on Staff Study re Alternative Contribution Methodologies*, CC Dockets Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, FCC 03-31 (rel. Feb. 26, 2003).

filing comments be extended to April 18, 2003, and the date for reply comments be extended to May 16, 2003. As explained below, extending the dates for initial and reply comments would allow the Parties adequate time to analyze the modeled assessment levels, burdens on residential and business customers, projected industry shares, and underlying assumptions that have been compiled in the Staff Study. Extending the dates would also allow the parties to harmonize their Staff Study comments with their reply comments on the *Second Further Notice of Proposed Rulemaking* (“*Second Notice*”).³ In short, the requested relief would further the Commission’s efforts to develop a complete, reliable record that will enable it to adopt needed long-term reforms to its universal service mechanisms.

In the *Second Notice*, the Commission outlined and invited parties to comment on a number of alternative approaches to assessing USF contributions, including: (1) a 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.⁴ 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.

³ *In re 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, & Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing & Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan & North American Numbering Plan Cost Recovery Contribution Factor & Fund Size; Number Resource Optimization; Telephone Number Portability; Truth-in-Billing & Billing Format*, Report & Order & Second Further Notice of Proposed Rulemaking, FCC 02-329, 2002 FCC LEXIS 6622 (rel. Dec. 13, 2002) (“*Second Notice*”).

⁴ *Id.* at ¶ 72.

The Staff Study, released on February 26, 2003, is a worthwhile effort to develop a more detailed record relating to these three proposals. AT&T and WorldCom believe that a careful analysis of the Staff Study, including the reliability of its underlying assumptions, will require more time than the existing pleading cycle permits. The Lotus spreadsheet that accompanies the Staff Study is lengthy, complex, and contains many assumptions and variables, all of which make it time-consuming to understand and manipulate.

Moreover, as the Commission knows, the existing deadline for reply comments on the *Second Notice* was chosen in part to enable commenters to better report on their initial experience in implementing the interim universal service changes adopted in the *Second Notice*.⁵ Although some ILEC tariffs are now being filed, the initial effect of the revised mechanisms will not be clear until some time after April 1, 2003, the day when providers begin to collect and contribute USF fees on the basis of projected revenues—and a day after the current due date for initial comments on the Staff Study. AT&T and WorldCom, therefore, ask that the comment date be extended to enable commenting parties to better evaluate the Staff Study proposals in light of their initial experience with the FCC’s revised revenues-based scheme. Unifying replies to the FNPRM and initial comments on the Staff Study also makes sense, as the issues are highly interrelated.

⁵ *In re 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, & Universal Service Support Mechanisms; Telecommunications Services for Individuals with Hearing & Speech Disabilities, and the Americans with Disabilities Act of 1990; Administration of the North American Numbering Plan & North American Numbering Plan Cost Recovery Contribution Factor & Fund Size; Number Resource Optimization; Telephone Number Portability; Truth-in-Billing & Billing Format*, Order, FCC 02-329, DA 03-203 (rel. Jan. 24, 2003), at ¶ 2.

Moreover, anticipating that parties may file variations of the FCC's study or perhaps models of their own, some additional time in the schedule for reply comments to permit full analysis of such submissions would also be appropriate.

Conclusion

For the foregoing reasons, AT&T and WorldCom request that the Commission extend the time for filing comments on the Staff Study to and including April 18, 2003 and extend the time for filing reply comments to and including May 16, 2003.

Respectfully submitted,

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