

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

In the Matter of	)	<b>WC Docket No. 03-157</b>
	)	
Petition for Forbearance From	)	
The Current Pricing Rules for	)	
The Unbundled Network Element	)	
Platform	)	

**REQUEST FOR EXTENSION OF COMMENT PERIOD**

AT&T Corp., Birch Telecom, Broadview Networks, Inc., Covad Communications Company, MCI, Sage Telecom, Inc., Talk America, Z-Tel Communications, Inc., CompTel and the PACE Coalition respectfully request a three-week extension of the deadline for filing opening comments in the above-referenced proceeding, extending the deadline from July 28, 2003 to August 18, 2003, as well as a corresponding three-week extension to the deadline for filing reply comments, with a new reply comment deadline of September 2, 2003.

Verizon's Petition raises legal and factual issues regarding the Commission's TELRIC pricing rules, the standard for forbearance, and whether there is any legitimate relationship between TELRIC pricing and investment in the telecommunications industry. While many of these allegations were raised in the Triennial Review Proceeding and proved there to be baseless, the Petition, as well as the 29-page white paper entitled "The Negative Effect of Applying TELRIC Pricing to the UNE Platform

on Facilities-Based Competition and Investment” attached to the Petition, require a full response supported by necessary factual and economic data to ensure that the record of this proceeding is complete. Preparation of such a response will require more than the 3-week period that commenters are currently allowed.

Moreover, the issues raised in Verizon’s Petition may be informed or addressed by the conclusions reached in the Triennial Review Proceeding, specifically by the “clarifications” to the TELRIC pricing rules that the Commission has announced will be made in its Final Report and Order on the Triennial Review Proceeding. Because that Final Order has not yet been released, commenters have no way of knowing how any clarification -- or any other Commission conclusion in that Order -- may impact the issues raised by Verizon in this proceeding.

For all these reasons, the parties signed below respectfully request a brief, three-week extension to the comment period, with a corresponding extension of time to the reply comment deadline.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Lawrence J. Lafaro  
Chief Regulatory Counsel  
AT&T Corp.  
900 Route 202/206N  
Bedminster, NJ 07921  
(908) 532-1850

\_\_\_\_\_/s/\_\_\_\_\_  
Russell C. Merbeth  
Federal Policy Counsel  
Birch Telecom  
3213 Duke St., #246  
Alexandria, VA 22314

\_\_\_\_\_/s/\_\_\_\_\_  
Rebecca H. Sommi  
VP Operations Support  
Broadview Networks, Inc.  
400 Horsham Road  
Horsham, PA 19044  
215-293-8715

\_\_\_\_\_/s/\_\_\_\_\_  
Jason Oxman  
Assistant General Counsel  
Covad Communications Company  
600 14th Street, N.W., Suite 750  
Washington, D.C. 20005  
202-220-0400

\_\_\_\_\_/s/\_\_\_\_\_  
Kimberly Scardino  
Senior Counsel  
MCI  
1133 19th Street, NW  
Washington, DC 20036  
(202) 736-6478  
kimberly.scardino@mci.com

\_\_\_\_\_/s/\_\_\_\_\_  
Robert W. McCausland  
Vice President, Regulatory Affairs  
Sage Telcom, Inc.  
805 Central Expressway South, Suite 100  
Allen, Texas 75013  
Tel. (214)495-4074  
Fax. (214)495-4795

\_\_\_\_\_/s/\_\_\_\_\_  
Francie McComb  
Vice President, Regulatory Affairs  
Talk America Inc.  
6805 Route 202  
New Hope PA 18938  
Tel: (215) 862-1517  
Fax: (215) 862-1085

\_\_\_\_\_/s/\_\_\_\_\_  
Tom Koutsky  
Z-Tel Communications, Inc.  
1200 19<sup>th</sup> Street  
Washington, DC 20036

\_\_\_\_\_/s/\_\_\_\_\_  
Carol Ann Bischoff  
Executive Vice President and  
General Counsel  
Competitive Telecommunications  
Association  
1900 M Street NW  
Suite 800  
Washington DC 20036

\_\_\_\_\_/s/\_\_\_\_\_  
Genevieve Morelli  
Kelley Drye & Warren LLP  
1200 19th St., NW  
Suite 500  
Washington, D.C. 20036  
202-955-9600  
Attorney for the PACE Coalition

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