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ORIGINAL

July 8, 2003

Mr. William Maher  
Chief, Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, 5<sup>th</sup> Floor  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Request for Extension of Comment Period  
WC Docket No. 03-157

Dear Bill:

Attached please find a Request for Extension of Comment Period in connection with Verizon's recently filed Petition for Expedited Forbearance. This request, which is being submitted by 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, is being filed today in the public record of the above-referenced proceeding.

Thank you for your consideration of this Request.

Sincerely,

A handwritten signature in black ink, appearing to be "Joan Marsh", written over a horizontal line.

Joan Marsh

cc: Tamara Preiss, Jeremy Marcus

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

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Petition for Forbearance From )  
The Current Pricing Rules for )  
The Unbundled Network Element )  
Platform )

**WC Docket No. 03-157**

**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/  
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\_\_\_\_\_  
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/s/

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/s/

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/s/

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\_\_\_\_\_/s/\_\_\_\_\_  
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\_\_\_\_\_/s/\_\_\_\_\_  
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July 8, 2003