

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

In the Matter of)	
)	
Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers)	CC Docket No. 01-338
)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996)	CC Docket No. 96-98
)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability)	CC Docket No. 98-147

Request for Extension of Comment Period

The Competitive Telecommunications Association (“CompTel”) respectfully requests a two week extension of the deadline for filing comments in the above-captioned proceeding (*i.e.*, until October 17, 2003), as well as a corresponding two week extension of the deadline to file reply comments (*i.e.*, until November 17, 2003). CompTel believes that a grant of this request is in the public interest, because it will allow all parties the opportunity to consider and evaluate the Commission’s Further Notice of Proposed Rulemaking released along with the *Triennial Review Order* on August 21, 2003.¹

The release of the *Triennial Review Order* has required both internal and outside counsel of all industry participants to focus carefully on absorbing the Commission’s new substantive rules, as well as on the litigation precipitated by that decision. Similarly, the

¹*Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, Report and Order on Remand and Further Notice of Proposed Rulemaking, CC Docket Nos. 96-98, 98-147 and 01-338 (*Triennial Review Order and FNPRM*) (rel. August 21, 2003).

Commission's *FNPRM* also demands careful consideration—not only of the specific issues noticed for comment—but also requires an analysis of carriers' experience regarding negotiation and arbitration of interconnection agreements under the existing pick and choose rules, dating from adoption of the *Local Competition Order*. Clearly, this modest extension is warranted to allow all parties to better examine and analyze the substantial amount of empirical evidence regarding the effects of the Commission's existing, and proposed, pick and choose rules. An extension of time to file comments and reply comments will likely result in a more complete public record, and will cause no prejudice to any party. Therefore, CompTel urges the Commission to grant this request.

Respectfully submitted,

_____/s/_____
Jonathan D. Lee
Vice President, Regulatory Affairs
Competitive Telecommunications
Association.
1900 M Street, N.W.
Suite 800
Washington, D.C. 20036
(202) 296-6650

September 23, 2003