

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

In the Matter of

Telephone Number Portability

CTIA Petition for Declaratory Ruling on
Wireline-Wireless Porting Issues

CC Docket No. 95-116

MOTION FOR EXTENSION OF TIME

BellSouth Corporation, on behalf of BellSouth Telecommunications, Inc. (“BellSouth”), respectfully submits this motion seeking an extension of the deadlines for filing comments and reply comments on the *Further Notice of Proposed Rulemaking* (“*FNPRM*”) in the above-captioned proceeding. Specifically, BellSouth requests that the dates for filing comments and reply comments be extended to January 30, 2004, and February 20, 2004, respectively.¹ As demonstrated below, good cause exists to grant this request.

The issues on which the Commission are seeking comment – rate center disparity and the modification of the porting interval for intermodal porting – are complex. All parties involved in this debate for nearly a decade can attest to the significant technical and competitive implications associated with porting outside a rate center and reducing the porting interval. To assist the Commission in its efforts to resolve these important issues, parties must be afforded sufficient

¹ The current dates for filing comments and reply comments are December 30, 2003 and January 9, 2004, respectively, based on publication of the *FNPRM* in the Federal Register on December 10, 2003. 68 Fed. Reg. 68,831 (Dec. 10, 2003).

time to provide meaningful and substantive input. However, the current schedule does not allow adequate time given the overlapping holiday season. The current deadline for comments is December 30, 2003. For BellSouth, and probably most other commenters, the majority of technical personnel and subject matter experts critical to providing information for inclusion in the record will be on vacation during most of the pleading cycle. An extension would allow commenters additional time to provide more substantive input than the current filing schedule permits.

BellSouth also requests an extension of the deadline for filing replies. No doubt, there will be a large volume of comments filed given the large number of parties affected and the complexity of the issues. The 10-day timeframe for replies simply does not allow an adequate opportunity to provide a meaningful response. It is critical that the Commission afford parties adequate time to thoroughly review and analyze the proposals and evidence submitted by commenters in the initial round of comments.

Considering that these issues have been left unresolved for nearly eight years and the fact that wireless number portability is proceeding today based on the conditions recently set forth by the Commission in its *Memorandum Opinion and Order*,² the modest extension as requested herein will not prejudice any interested party or harm the public interest. BellSouth strongly believes that the quality and value of the comments and replies would be greatly improved if commenters are given more time to respond to the *FNPRM* as well as review and analyze the initial comments filed.

² See *Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, CC Docket No. 95-116, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, FCC 03-234 (rel. Nov. 10, 2003).

Moreover, an extension would make it more likely that commenters' pleadings could be informed by the work performed by the North American Numbering Council ("NANC") at the request of the Commission. Specifically, the Commission has asked the NANC to provide input on modifying the porting interval for intermodal porting.³ The NANC does not meet again until January 13, 2003. It is possible that the NANC could release its recommendation during the extended pleading cycle, thereby enabling parties to provide comment on its proposal. Such a result would allow for a more complete and reliable record upon which the Commission could render a decision.

In conclusion, because the potential impact of the proposals detailed in the *FNPRM* upon the wireline and wireless telecommunications industry segments is significant, it is critical that the Commission afford parties adequate time to provide substantive and meaningful comments and replies. The fact that the current pleading cycle falls squarely in the middle of the holiday season when key personnel are unavailable justifies an extension. In addition, an extension could allow parties time to offer input on the requested recommendation from the NANC. In light of the foregoing, the Commission should grant BellSouth's motion and extend the dates for filing comments and replies on the Commission's *FNPRM* to January 30, 2004, and February 20, 2004, respectively.

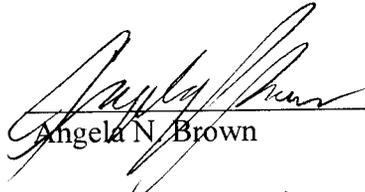
³ *Telephone Number Portability; CTIA Petitions for Declaratory Ruling on Wireline-Wireless Porting Issues*, CC Docket No. 95-116, *Memorandum Opinion and Order and Further Notice of Proposed Rulemaking*, FCC 03-234, ¶ 51 (rel. Nov. 10, 2003).

Respectfully submitted,

BELLSOUTH CORPORATION

Its Attorney

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December 11, 2003

CERTIFICATE OF SERVICE

I do hereby certify that I have this 11th day of December 2003 served the following parties to this action with a copy of the foregoing **MOTION FOR EXTENSION OF TIME** by electronic filing to the parties listed below.

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