

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Section 68.4(a) of the Commission's Rules)	WT Docket No. 01-309
Governing Hearing Aid-Compatible)	RM-8658
Telephones)	

To: Chief, Wireless Telecommunications Bureau

**ALLTEL COMMUNICATIONS, INC.
REQUEST FOR LIMITED EXTENSION
OF THE MAY 17, 2004 SEMIANNUAL REPORTING DEADLINE**

Pursuant to Sections 1.3 and 1.925 of the Commission's rules, 47 C.F.R. §§ 1.3, 1.925, ALLTEL Communications, Inc. ("ALLTEL") hereby requests a limited, short-term extension of the May 17, 2004 reporting deadline set forth in the Commission's *Report and Order* in the above-captioned proceeding.¹ For the reasons discussed below, grant of the requested extension through *Monday, May 24, 2004* would be in the public interest. ALLTEL will endeavor to file its report well in advance of the requested May 24, 2004 date.

REQUEST FOR RELIEF

ALLTEL takes its reporting obligations seriously and has initiated the internal processes necessary to accurately and meaningfully provide information responsive to the terms of the *Report and Order*. Due to personnel changes at ALLTEL and late-provided information from ALLTEL's equipment vendors concerning their compliance efforts, however, additional time is

¹ See *In the Matter of Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones*, WT Docket No. 01-309, RM-8658, FCC 03-168, ¶¶ 89-91 (rel. August 14, 2003), *reconsideration pending*; Public Notice, *Wireless Telecommunications Bureau* (continued on next page)

needed beyond the initial May 17, 2004 semiannual reporting deadline for ALLTEL to confirm the accuracy of and compile the information the Commission requested in the *Report and Order*.

The minimal extension requested herein will in no way undermine the Commission's objective of verifying compliance with various benchmarks.² ALLTEL's first compliance benchmark does not occur until September 16, 2005 and, as the Commission is aware, industry standards development and testing efforts are still under way at the HAC Incubator during this very early stage; thus, the information provided at this early stage of compliance will necessarily be preliminary in nature.³ In any event, as ALLTEL seeks only a short-term extension of the filing deadline, the Commission will have the information required of ALLTEL shortly. Given the Commission's interest in ensuring a complete and accurate report, grant of the instant request is warranted.⁴

Announces Hearing Aid Compatibility Reporting Dates for Wireless Carriers and Handset Manufacturers, WT Docket No. 01-309, DA 04-630 (rel. March 8, 2004) ("*Public Notice*").

² See *Public Notice*.

³ See ATIS Initial Report in WT Docket No. 01-309, filed May 17, 2004.

⁴ See 47 C.F.R. § 1.925(b)(3)(ii); *Northeast Cellular Tel. Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (waiver appropriate when "particular facts would make strict compliance inconsistent with the public interest"); Letter to Ms. Michelle Thomas, Executive Director – Federal Regulatory, SBC Telecommunications, Inc., from Carol E. Matthey, Deputy Chief, Common Carrier Bureau, 16 FCC Rcd 20159 (Com. Car. Bur. 2001) (granting 1-month extension of reporting date to ensure accuracy of data submitted); Letter to Mr. James W. Callaway, Group President – SBC Services, from Carol E. Matthey, Deputy Chief, Common Carrier Bureau, 15 FCC Rcd 15001 (Com. Car. Bur. 2000) (granting 3-month extension due in part to "significant, and unanticipated, additional work" necessary to complete report).

CONCLUSION

For the foregoing reasons, grant of the requested extension of the May 17, 2004 reporting deadline is consistent with the public interest. ALLTEL's requested relief is temporary, limited in scope, and will not undermine Congress' and the Commission's statutory and public interest objectives.

Respectfully submitted,

ALLTEL COMMUNICATIONS, INC.

By: /s/ Glenn S. Rabin
Glenn S. Rabin
Vice President Federal Regulatory Affairs
ALLTEL Communications Inc.
601 Pennsylvania Ave., N.W., Suite 720
Washington, DC 20004
(202) 783-3976

Its Attorney

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