

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

)	
In the Matter of)	
)	
The Pay Telephone Reclassification and)	CC Docket No. 96-128
Compensation Provisions of the)	
Telecommunications Act of 1996)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s rules, 47 C.F.R. § 1.46, Telco Group, Inc. (“Telco Group”) respectfully requests an extension of time to file a System Audit Report as required by Section 64.1320(b) of the Commission’s rules and the *Report and Order* issued by the Commission in the above-referenced docket.^{1/} Specifically, Telco Group seeks a 90-day extension of the July 1, 2004 reporting deadline until October 1, 2004.^{2/}

Pursuant to the Commission’s rules, Telco Group is required to implement a call tracking system for payphone-originated calls, complete an audit of its call tracking system, and file a System Audit Report with the Commission by July 1, 2004.^{3/} Telco Group completed the changes to its systems to implement the call tracking system by July 1, 2004 as required by the Commission’s rules.^{4/} Telco Group, however, requires additional time to complete the audit of its call tracking system. Telco Group is working diligently with an outside auditor to complete

^{1/} 47 C.F.R. § 64.1320(b); *The Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Report and Order, 18 FCC Rcd 19975 (2003) (“*Order*”).

^{2/} Telco Group respectfully requests that the Commission accept this Motion for filing in the above-referenced docket. No party will be prejudiced by permitting this Motion to be filed.

^{3/} 47 C.F.R. §§ 64.1300(a), 1310, 1320.

^{4/} 47 C.F.R. § 64.1310(a).

the documentation and testing, analyze the results, and prepare a final report as required under the Commission's rules. Accordingly, Telco Group requests a 90-day extension to ensure the auditors have adequate time to complete their tasks and present reliable and comprehensive information to the Commission.

To the extent necessary, Telco Group requests a waiver of the late filing penalty set out in the *Order*.^{5/} Telco Group submits that no one will be harmed by the late-filed System Audit Report. Telco Group has the required call tracking system in place and will make the necessary calculations and payments to ensure that payphone service providers are properly compensated. In addition, Telco Group will have its System Audit Report completed and filed before the date on which payments are due to payphone service providers.

Telco Group has attempted in good faith to meet the July 1, 2004 deadline for filing the System Audit Report; however, for the reasons described herein, Telco Group requires additional time. Accordingly, Telco Group hereby respectfully requests a 90-day extension of the reporting deadline until October 1, 2004 to submit the System Audit Report to the Commission, to each payphone service provider for which it completes calls, and to each facilities-based long distance

^{5/} *Order* ¶ 44.

carrier from which it receives payphone calls. In addition, for the same reasons, Telco Group respectfully requests a waiver of any late filing penalty.

Respectfully submitted,

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