

**FEDERAL-STATE JOINT BOARD )  
ON UNIVERSAL SERVICE REQUEST )  
FOR COMMENT ON PROPOSALS )  
TO MODIFY THE COMMISSION'S )  
UNIVERSAL SERVICE SUPPORT )**

**CC DOCKET 96-45**

**REQUEST FOR 60-DAY EXTENSION  
FOR FILING OF COMMENTS  
BY TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

COMES NOW TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC. ("TSTCI"), and files this its Motion for a 60-day extension for the filing of comments to the Federal-State Joint Board on Universal Service request for comment of Proposals to modify the FCC's rules relating to high-cost universal service support, and would respectfully show as follows:

**I. Motion for 60-Day Extension**

For the reasons stated herein, TSTCI respectfully moves for a 60-day extension from the September 16, 2005 deadline for the filing of comments by interested parties, to a new deadline of November 16, 2005.

This motion is made for good cause, and not for purposes of delay or to prejudice the rights of any interested party or person. In fact, TSTCI so moves to preserve the rights, and not prejudice the interests, of its members and other similarly-situated persons.

## **II. Introduction**

TSTCI is a statewide organization of small independent and cooperative incumbent local exchange carriers, each licensed and certificated as eligible telecommunications carriers ("ETCs") and providing local exchange services within the state of Texas. The organization consists of 38 small ILECs, each of whom is dependent upon the receipt and use of federal funding support through the federal universal service fund. As such, each may be dramatically impacted by the results of this proceeding.

The individual TSTCI companies serve the vast farm and ranch rural areas of the state of Texas. The 38 companies represented collectively provide less than one per cent of the total access lines served in Texas, yet the companies collectively have an aggregated service area of almost half the geographic area of Texas.

A list of the TSTCI members companies is attached as Attachment I and incorporated herein for all purposes.

## **III. Reasons in Support of Motion**

TSTCI strongly requests the extension for filing comments because of the importance of a detailed and reasoned response in behalf of TSTCI members related to the importance of the subject matter of this comment consideration. Universal service funding is crucial for the individual TSTCI members companies because of the very high-cost rural areas served by such companies.

Specifically, the TSTCI companies request the extension for reasons including as follows:

- The relative short time frame initially allowed for comment. The importance of the subject matter to the TSTCI companies, combined with their overall lack of resources for a quick response, unduly prejudices their ability to provide reasoned and comprehensive comments. An extension would allow the TSTCI companies the ability to exercise their due process rights on such a vital issue.
- Because of the size of its membership (38 companies), there are too many companies to individually review the data necessary to file comprehensive comments in the short time frame initially established. The extension would better allow TSTCI to address the individual-company issues involved in such a comprehensive comment process.
- The initial comment period was extremely short, especially considering the federal and state holiday weekend at issue. Combined with the lesser individual resources of the individual companies, and the natural logistics of a collective response, TSTCI requests the extension in an appeal to the equitable sense of fairness.

- Hurricane catastrophe issues. The entire state of Texas has been intimately involved in assisting the state of Louisiana and the city of New Orleans as related to the recent impact of Hurricane Katrina. Texas quickly developed into a state of refuge for such hurricane victims. Telecommunications-related issues are at the forefront of such efforts, and the time lost related to the issues has negatively impacted the TSTCI companies' abilities to fashion reasoned and comprehensive comments on the vital issue of universal service support.
- The TSTCI companies are highly dependent on universal service support. As such, any consideration to changes in its present funding processes may greatly prejudice such companies. On such an important issue, it is critical that the impacted companies be given every reasonable opportunity to address all the related issues of universal service.
- The Joint Board seeks comments related to the apparent suggested wholesale reform of the Universal Service Program. There are presently four different proposals for reformation of the USF. The magnitude of the proposals and the expected outcome require reasoned and deliberate consideration; which the extension is requested to accomplish.
- Additional time is requested in order to allow the impacted companies to fully study, consider applicable data, and analyze the significant changes proposed in the four new concepts.

**IV. Conclusion**

For the reasons stated herein, TSTCI respectfully moves for a 60-day extension in the comment period deadline to November 16, 2005.

Respectfully submitted,

Richards, Elder, Srader, Phillips & McLaren, L.L.P.

A handwritten signature in cursive script that reads "Don R. Richards".

By

Don R. Richards  
*Attorneys for Texas Statewide Telephone  
Cooperative, Inc.*

**TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.**

Big Bend Telephone Company  
Brazos Telecommunications, Inc.  
Brazos Telephone Coop., Inc.  
Cameron Telephone Company  
Cap Rock Telephone Coop., Inc.  
Central Texas Telephone Coop., Inc.  
Coleman County Telephone Coop., Inc.  
Colorado Valley Telephone Coop., Inc.  
Comanche County Telephone Company, Inc.  
Community Telephone Company, Inc.  
Cumby Telephone Coop., Inc.  
Dell Telephone Coop., Inc.  
E.N.M.R. Telephone Coop., Inc.  
Eastex Telephone Coop., Inc.  
Electra Telephone Company  
Etex Telephone Coop., Inc.  
Five Area Telephone Coop., Inc.  
Industry Telephone Company, Inc.  
Ganado Telephone Company, Inc.  
La Ward Telephone Exchange, Inc.  
Lake Livingston Telephone Company  
Lipan Telephone Company  
Livingston Telephone Company  
Mid-Plains Rural Telephone Coop., Inc.  
Nortex Communications, Inc.  
North Texas Telephone Company  
Panhandle Telephone Coop., Inc.  
Peoples Telephone Coop., Inc.  
Poka Lambro Telephone Coop., Inc.  
Riviera Telephone Company, Inc.  
Santa Rosa Telephone Coop., Inc.  
South Plains Telephone Coop., Inc.  
Tatum Telephone Company  
Taylor Telephone Coop., Inc.  
Wes-Tex Telephone Coop., Inc.  
West Plains Telecommunications, Inc.  
West Texas Rural Tel. Coop., Inc.  
XIT Rural Telephone Coop., Inc.