

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20544**

<i>In the Matter of</i>)	
)	
<i>Developing a Unified Intercarrier Compensation Regime</i>)	CC Docket Nos. 01-92
)	
<i>Missoula Intercarrier Compensation Plan</i>)	[DA 06-1510]
)	

**MOTION OF THE
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS
FOR EXTENSION OF TIME**

Pursuant to Rule 1.46 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules of Practice and Procedure, 47 C.F.R. § 1.46 (2006), the National Association of Regulatory Utility Commissioners (NARUC), on behalf of several of its member commissions, respectfully files this motion requesting an extension of the comment cycle for the Missoula Intercarrier Compensation Plan noticed in the August 9, 2006 Federal Register (71 Fed. Reg. 45510). Currently the comment cycle requires initial comments on September 25, 2006 and reply comments on November 9, 2006. NARUC requests the FCC extend the time for all initial comments to October 25, 2006 and to correspondingly extend the time for reply comments to December 9, 2006. In support of this request, NARUC states as follows:

I. NARUC’S INTEREST

NARUC is a quasi-governmental nonprofit organization founded in 1889. NARUC’s members include those governmental bodies of the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands, which engage in the regulation of carriers and utilities. NARUC’s mission is to improve the quality and effectiveness of public utility regulation in America.

NARUC's member commissions are charged with the duty of regulating the telecommunications common carriers within their respective borders. They each have the obligation to assure that such telecommunications services and facilities as may be required by the public convenience and necessity are universally provided at rates that are just and reasonable. As discussed below, this proposal, insofar as it could directly affects end-user rate structures/fees accessed for basic service, and has some preemptive elements, clearly impacts upon this obligation. Given the complexity of the final proposal, all of NARUC's member commissions are carefully studying the proposal, several through public workshops. More than eight of NARUC's member commissions, including New Jersey, California, Pennsylvania, Ohio, Wyoming, Washington State, and Massachusetts, specifically asked NARUC to file this request to give them more time to prepare their comments.

II. BACKGROUND

NARUC and its member commission have a long held and obvious interest in intercarrier compensation, including any proposal that could result in increases to the federal subscriber line charge - which is generally viewed by ratepayers as a local rate increase in spite of its interstate character. Any adjustments to intercarrier compensation will have clear impacts on State universal service policy. Indeed, NARUC's interest in the topic resulted in the creation of the separate task force almost three years ago that ultimately facilitated the industry compromise up for comment. The Federal Register notice sets September 25 and November 9, 2006, as the dates for initial and reply comments on the ILECs' November submissions.

III. NEED FOR RELIEF

While NARUC did arrange for internal briefings on the 111 page Missoula plan. The proposal is complex and many of NARUC's members lack the staff resources to complete an

analysis of the proposal in the time provided. Several Commissions have planned workshops on the proposal as a way of getting a baseline for their own comments to the FCC. This plan (i) obviously raises issues of concern to the NARUC's state commission membership and (ii) could impact upon these members' ability to adhere to their respective mandates to serve the public interest. No other participant's filed initial and reply comments can adequately represent the viewpoint of those NARUC's members that plan to file in this proceeding.

This viewpoint is necessary to fully illuminate the issues raised by this proposal and assure a complete record upon which to base a decision. Hence, granting the requested extension will serve the public interest by ensuring State commissions continued full participation.

IV. CONCLUSION

Accordingly, because of the critical importance of the issues raised by this proposal and the clear need for additional time to adequately review and analyze the 111 page detailed proposal submitted, NARUC respectfully requests the FCC extend the time for all initial comments approximately an additional month to October 25, 2006 and to correspondingly extend the time for reply comments to December 9, 2006.

Respectfully Submitted,

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