

**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 a second extension of the comment cycle for the Missoula Intercarrier Compensation Plan noticed in the August 9, 2006 Federal Register (71 Fed. Reg. 45510). Pursuant to an earlier NARUC request, the FCC extended the initial and reply comment dates. Well over a hundred comments were filed on or about the initial comment date of October 25, 2006. Currently the comment cycle requires reply comments on December 11. NARUC respectfully requests that the FCC extend the time for all initial comments 30 days to January 11, 2007. 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. More

specifically, NARUC is composed of the State officials charged with the duty of regulating the telecommunications common carriers within their respective borders. As such, they 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, the FCC's proposed action, insofar as it directly affects end-user rate structures/fees accessed for basic service, and has some preemptive elements, clearly impact upon this obligation. Because of the number and length of the initial comments filed, a number of NARUC's member commissions have specifically requested that NARUC file this request.

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. Well over a hundred comments were filed on or about the initial comment date of October 25, 2006. Currently the comment cycle requires reply comments on December 11.

III. NEED FOR RELIEF

NARUC appreciates the FCC's recognition of the need for additional time expressed by many of NARUC's member commissions to digest and prepare initial comments. Quite a few of NARUC's members that otherwise would not have been able to make timely filings were able to do so because of the 1st extension granted. The same reasons supporting that original request

apply to this second request. Given the number, length of variety of initial comments, many of NARUC's members are again in the position of lacking the staff resources to complete an analysis of those comments in the time provided. 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 reply comments can adequately represent the viewpoint of those NARUC's members that plan to file replies 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 100 plus initial comments. NARUC respectfully requests the FCC extend the time for all reply comments an additional 30 days to January 11, 2007.

Respectfully Submitted,

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