

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

In the Matter of)	
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	

MOTION FOR EXTENSION OF TIME

Rural Cellular Association (“RCA”),¹ and the Alliance of Rural CMRS Carriers (“ARC”)², by counsel, respectfully submit this Motion seeking an extension of the deadline for reply comments in response to the comments filed June 6, 2007, pursuant to the *Recommended Decision* of the Federal-State Joint Board on Universal Service (“Joint Board”), FCC 07J-1 (released May 1, 2007) (“*Recommended Decision*”).³ Specifically, RCA and ARC request that the date for filing reply comments be extended to June 20, 2007. As demonstrated below, good cause exists to grant this motion for extension of time.

Reply comments are currently due to be filed no later than June 13, 2007, just five business days after the deadline for filing comments. Five business days simply does not allow

¹ RCA is an association representing the interests of approximately 100 small and rural wireless licensees providing commercial services to subscribers throughout the nation. RCA’s wireless carriers operate in rural markets and in a few small metropolitan areas. No member has as many as 1 million customers, and all but two of RCA’s members serve fewer than 500,000 customers.

² ARC is a group of CMRS carriers who are licensed to serve rural areas in Colorado, Nebraska, Guam, Wisconsin, Alabama, Mississippi, West Virginia and South Carolina. ARC’s membership is comprised of the following carriers (or their subsidiaries): Cellular South Licenses, Inc., Guam Cellular and Paging, Inc., N.E. Colorado Cellular, Inc., Easterbrooke Cellular Corp., Airadigm PCS, Hargray Wireless and the Cellcom Companies.

³ *Recommended Decision* at para. 1. These comments are filed within 14 days after publication in the Federal Register. See *Comment Cycle Established for Commission’s Notice of Proposed Rulemaking Regarding an Interim*

sufficient time to obtain and review the substantial number of extensive comments filed in this proceeding, develop a consensus among the companies as to how to respond, and articulate that response in the form of reply comments. In addition, counsel for RCA and ARC, as well as for some other commenters, have necessarily had much of their time diverted to the preparation of written testimony before the Senate Committee on Commerce, Science, and Transportation at a full committee hearing on universal service reform on Tuesday, June 12, 2007. Because of the short timeframe given for preparation of Senate testimony, the bulk of the preparation must be completed during the abbreviated time period between the comment and reply comment deadlines in the above-captioned proceeding.

The Commission's Electronic Comment Filing System ("ECFS") shows a total of 168 comments having been filed, totaling more than 800 pages. This proceeding is of critical importance to competitive carriers seeking to use high-cost universal service support to construct facilities and provide service to consumers in rural areas as quickly as possible. This proceeding involves a substantial number of complex legal and factual issues. Additional time to examine these issues will serve the public interest since the Commission's decision on whether to impose the cap recommended by the Joint Board will have a significant impact on the Commission's efforts to fulfill the pro-competitive mandates of the Telecommunications Act of 1996 and ensure that consumers in rural areas have access to services that are reasonably comparable to those available in urban areas.

To develop a meaningful record that reasonably reflects the views of affected participants, commenters must be afforded sufficient time to provide adequate and substantive input. A grant of the requested one-week extension will allow members of RCA and ARC to

meet and discuss the important issues raised by the comments and incorporate the results of those discussions in their reply comments. As the Commission considers the cap proposed by the Joint Board, it will certainly be aided by meaningful, rather than rushed, abbreviated reply comments addressing the justification and potential consequences of the proposed cap. We are aware that the Commission recently granted a request for a one-week extension of a reply comment deadline in virtually identical circumstances.⁴

In light of the foregoing, RCA and ARC respectfully request that the Commission extend the due date for reply comments in this proceeding to June 20, 2007.

Respectfully submitted,

**RURAL CELLULAR ASSOCIATION AND THE
ALLIANCE OF RURAL CMRS CARRIERS**



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⁴ *In The Matter of Service Rules for the 698-746, 747-762 and 777-792 Mhz Bands et al.*, WT Docket Nos. 06-150 et al., 2007 WL 159351 (F.C.C.) (rel. May 25, 2007) (granting a one-week extension based, in part, on the finding “that four business days does not allow sufficient time to obtain and review the substantial number of initial comments filed in this proceeding and to develop a response to those comments and articulate that response in the form of reply comments.”)