

**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

The National Association of State Utility Consumer Advocates (“NASUCA”)¹, respectfully submits this Motion seeking an extension of the deadline for reply comments in response to the comments filed May 31, 2007, pursuant to the Public Notice released on May 1, 2007.² Those reply comments are currently due July 2, 2007. NASUCA requests that the date for filing reply comments be extended by three weeks, to July 23, 2007. As demonstrated below, good cause exists to grant this motion for extension of time.

The May 1, 2007 Public Notice requested comments on long-term, comprehensive reform of the federal high-cost universal service mechanisms. In the Public Notice, the Federal-State Joint Board on Universal Service (“Joint Board”)

¹ NASUCA is a voluntary, national association of consumer advocates in more than forty states and the District of Columbia, organized in 1979. NASUCA’s members are designated by the laws of their respective states to represent the interests of utility consumers before state and federal regulators and in the courts. *See, e.g.*, Ohio Rev. Code Chapter 4911; 71 Pa. Cons. Stat. Ann. § 309-4(a); Md. Pub. Util. Code Ann. § 2-205(b); Minn. Stat. Ann. Subdiv. 6; D.C. Code Ann. § 34-804(d). Members operate independently from state utility commissions, as advocates primarily for residential ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (*e.g.*, the state Attorney General’s office). Associate and affiliate NASUCA members also serve utility consumers, but have not been created by state law or do not have statewide authority.

² FCC 07J-2 (“Public Notice”). Unless indicated otherwise, all citations herein are to orders and filings in CC Docket 96-45 or WC Docket 05-337.

specifically requested parties to address reverse auctions for universal service support³; geographic information systems/network cost modeling⁴; disaggregation of support⁵; competitive eligible telecommunications carrier (“CETC”) support⁶; and support for broadband.⁷

Of course, those five topics do not represent the universe of subjects regarding long-term, comprehensive reform of the federal high-cost universal service mechanisms. Therefore, NASUCA in its comments, and most other parties in their comments, addressed a substantial number of those other issues.

As a result of the number of topics of concern, there were some 56 comments filed, consisting of at least 1,226 pages, filed on May 31, 2007.⁸ It is vital for long-term, comprehensive reform of the federal high-cost universal service mechanisms that the Joint Board receive equally comprehensive replies to those comments.

NASUCA recognizes that the Joint Board has committed to making a recommendation to the Federal Communications Commission (“Commission”) within six months of May 1, 2007.⁹ NASUCA also recognizes that that will be a difficult task. But in the absence of carefully prepared and comprehensive responses to the many comments filed, the Joint Board’s recommendation will not be adequately informed. NASUCA also submits that a correct Recommended Decision is as important as one that meets the Joint Board’s self-imposed deadline.

³ Public Notice, ¶ 4.

⁴ Id., ¶ 5.

⁵ Id., ¶ 6.

⁶ Id., ¶ 7.

⁷ Id., ¶ 8.

⁸ Based on a count of the comments listed in the Electronic Comment Filing System.

⁹ See Recommended Decision, FCC 07J-1 (rel. May 1, 2007), ¶¶ 1, 14.

In addition, counsel and representatives of NASUCA, as well as other commenters, necessarily had much of their time diverted to preparation of comments and reply comments on the Joint Board's recommendation that the Commission impose a cap on the CETC high-cost fund.¹⁰ Those comments were devoted to a single subject, and although more numerous (168), contained fewer pages (more than 800).¹¹ An eight-day extension was granted for the reply.¹² Under these circumstances, a three-week extension for the reply comments on long-term, comprehensive reform of the federal high-cost universal service mechanisms is appropriate.

In light of the foregoing, NASUCA respectfully request that the Commission extend the due date for reply comments in this proceeding to July 23, 2007.

Respectfully submitted,

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¹⁰ See FCC 07J-1 and Notice of Proposed Rulemaking, FCC 07-88 (rel. May 14, 2007).

¹¹ See United States Cellular Corporation and Rural Cellular Corporation Motion for Extension of Time, WC Docket No. 05-337, CC Docket No. 96-45 (filed June 11, 2007).

¹² See DA 07-2565 (rel. June 12, 2007).