



The unusually short 15-day period between the filing of initial comments and the due date for reply comments does not afford sufficient time for such analysis and response. In a similar proceeding where the Commission sought comments on a petition for declaratory ruling by Free Press that raised issues of policy and technology, the Commission from the outset provided 30 days between the filing of comments and reply comments – a time period that would be more reasonable in the present case, as well.<sup>1</sup>

Moreover, subsequent to the filing of the initial round of comments on the petitions, the Commission scheduled an *en banc* hearing on February 25, 2008, in Boston, to hear the views of expert panelists on network management practices. That hearing may shed additional light on the issues raised in the comments, and parties should be afforded ample time to consider and address matters raised at the hearing in their reply comments. But as things stand, reply comments are due on February 28 – just three days after the hearing.

An additional two weeks would give parties sufficient time to consider and respond thoroughly to the initial comments and to the testimony and submissions at the *en banc* hearing. Accordingly, PFF, IPI and Chamber request that the Commission extend the filing date for reply comments to March 13, 2008.

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<sup>1</sup> See “Wireless Telecommunications Bureau Seeks Comment on Petition for Declaratory Ruling That Text Messages and Short Codes Are Title II Services or Are Title I Services Subject to Section 202 Non-Discrimination Rules,” WT Docket 08-7, Public Notice, DA 08-78 (Jan.14, 2008). The Commission subsequently extended the *entire* pleading cycle by 30 days. Order, DA 08-282 (Feb. 1, 2008).

Respectfully submitted,

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