

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 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

CTIA – The Wireless Association® (“CTIA”), pursuant to Section 1.46(b) of the Federal Communications Commission’s (“FCC” or “Commission”) rules, respectfully requests a 14-day extension of the deadline for filing comments in response to three Notices of Proposed Rulemaking seeking comments on various proposals for long-term reforms to the high-cost universal service mechanisms, as well as a corresponding 14-day extension of the deadline to file reply comments.¹ Pursuant to this request, comments would be due April 17, 2008, and reply comments would be due May 19, 2008.

Additional time is necessary for parties to consider the important issues raised by the NPRMs and to prepare submissions enabling the Commission to make an informed decision based on a fully developed record.

On January 29, 2008, the Commission released three Notices of Proposed Rulemaking on proposals to reform the high-cost universal service mechanisms. One Notice of Proposed Rulemaking seeks comment on elimination of the so-called “identical support rule” that currently provides competitive eligible telecommunications carriers

¹ See High-Cost Universal Service Support, WC Docket No. 05-337, Notice of Proposed Rulemaking, FCC 08-4 (rel. Jan. 29, 2008) (“*Identical Support NPRM*”); High-Cost Universal Service Support, WC Docket No. 05-337, Notice of Proposed Rulemaking, FCC 08-5 (rel. Jan. 29, 2008) (“*Reverse Auctions NPRM*”); High-Cost Universal Service Support, WC Docket No. 05-337, Notice of Proposed Rulemaking, FCC 08-22 (rel. Jan. 29, 2008) (“*Joint Board NPRM*”).

(ETCs) serving rural, insular, and high-cost areas the same per-line support, if any, available to the relevant incumbent local exchange carrier (LEC). The *Identical Support NPRM* also seeks comment on what support methodology should replace the identical support rule. The second NPRM seeks comment on the merits of using reverse auctions (a form of competitive bidding) to determine the amount of high-cost universal service support provided to both incumbent and competitive ETCs. The third NPRM seeks comment on various recommendations by the Federal-State Joint Board on Universal Service (Joint Board) regarding comprehensive reforms to the high-cost universal service system. The Joint Board recommends that the Commission transition to three high-cost universal service funds: (1) One for wireline “Providers of Last Resort” for maintaining ongoing operations; (2) One for wireless deployment; and (3) One for broadband deployment. Each of the funds would have their own distinct purposes and obligations. The three NPRMs were published in the Federal Register on March 4, 2008. Accordingly, comments on the NPRMs are due April 3, 2008, and reply comments are due May 5, 2008.

The importance of the issues raised by the NPRMs cannot be understated. Reforms to the high-cost universal service mechanisms will impact whether, how, and under what terms American consumers located in high-cost, rural areas obtain access to affordable and comparable telecommunications and advanced services for the foreseeable future. The NPRMs raise novel concepts – such as limiting support to network build out, creating separate funds for different technologies, and determining support by conducting competitive bidding – that alone and in combination would amount to a radical departure from the current mechanisms used to determine high-cost universal service support. The

outcome of these proceedings is of critical importance to incumbent LECs, competitive LECs, terrestrial and satellite, mobile and fixed wireless carriers, and network providers, as well as state commissions, consumers, and organizations that represent consumers.

CTIA has long advocated reforms to the high-cost universal service mechanisms to ensure that they better reflect evolving consumer demand. CTIA also has commented that long-term reforms are overdue. However, given the complexity and implications of these three NPRMs, additional time is needed for parties to fully review and assess, and comprehensively respond to the NPRMs. Additional time is also helpful for parties representing disparate interests to consider whether compromise reform positions can be achieved. An extension of time to file comments and reply comments will produce a more complete public record and will not cause prejudice to any party. Importantly, an additional 14 days to prepare comments and reply comments need not delay the Commission's consideration of long-term reforms to the high-cost universal system.

For these reasons, CTIA respectfully requests that the Commission grant this motion for extension of time, and set the filing dates for comments in this docket on the universal service NPRMs as April 17, 2008, and for reply comments as May 19, 2008.

Respectfully submitted,

/s/ Paul Garnett

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