

**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 undersigned associations¹ respectfully request an extension of the deadline² for filing reply comments in response to comments filed on the three Notices of Proposed Rulemaking (NPRMs)³ concerning comprehensive reform of the High-Cost universal service program. Specifically, the associations request that the Commission extend the existing May 19 deadline for filing reply comments to June 9, 2008. This additional time is needed for the associations and other parties to develop well-considered and thorough responses to the substantial record amassed in this proceeding. In turn, this will produce a more complete record from which the Commission may base its decisions regarding reform of the High-Cost universal service program, which is central to the future of telecommunications in the rural areas served by the associations' members.

¹ Independent Telephone and Telecommunications Alliance (ITTA), National Exchange Carrier Association (NECA), National Telecommunications Cooperative Association (NTCA), Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), United States Telecom Association (USTelecom), and Western Telecommunications Alliance (WTA).

² Pursuant to 47 C.F.R. §1.46(b).

³ *High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1467 (2008) (Identical Support Rule NPRM); *High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1495 (2008) (Reverse Auctions NPRM); *High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Notice of Proposed Rulemaking, 23 FCC Rcd 1531 (2008) (Recommended Decision NPRM).

As the Commission is well aware, over 90 parties filed comments in response to the three NPRMs, producing a record totaling over 1,000 pages filled with highly-varied and often complex legal, policy, and economic arguments concerning reform of the High-Cost program. The ultimate resolution of the numerous issues raised in the NPRMs and filed comments will have a tremendous impact on the associations' members and, more importantly, on the communications services and rates that will be made available to the millions of rural consumers they serve. An extension of the reply comment deadline is both reasonable and necessary for the entire telecommunications industry to fully consider these challenging issues.

Also, it should be considered that the Commission found it reasonable to grant an extension of time for parties to file initial comments,⁴ even though the NPRMs were not published in the Federal Register until more than a month after they were released by the Commission, providing parties with approximately 11 weeks in total to respond.⁵ Unfortunately, the extension of time to file initial comments still left parties with only 30 days in which to file reply comments. With the three week extension being requested here, that still only provides parties with approximately seven weeks to file reply comments, significantly less than the time provided for initial comments. Certainly, such an extension is warranted and reasonable, as parties are called upon to respond to the proposals made by over 90 separate entities representing a telecommunications industry with extremely diverse views.

⁴ *High-Cost Universal Service Support*, WC Docket No. 05-337, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Order, DA 08-674 (rel. Mar. 24, 2008) (extending the deadline for initial comments to April 17, 2008).

⁵ The three NPRMs were released by the Commission on January 29, 2008. They were published in the Federal Register on March 4, 2008. *Identical Support Rule NPRM*, 73 Fed. Reg. 11580; *Reverse Auctions NPRM*, 73 Fed. Reg. 11591; *Joint Board Comprehensive Reform NPRM*, 73 Fed. Reg. 11587.

Finally, the short extension of the reply comment deadline requested by the associations will not harm the interests of any party. In fact, it is likely that most parties will welcome the chance to further consider the substantial record developed in this proceeding. Nor should a modest extension of the filing deadline be detrimental to the Commission. Rather, it will provide the Commission with a more complete record upon which to rely as it considers the numerous issues related to reform of the High-Cost universal service program which greatly affects consumers and communications service providers across the nation.

The undersigned associations therefore request that the Commission extend the deadline for filing reply comments in the above-captioned proceeding from May 19, 2008 to June 9, 2008.

Respectfully submitted,

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