



N A R U C
National Association of Regulatory Utility Commissioners

May 13, 2008

VIA ELECTRONIC DELIVERY

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW B204
Washington, DC 20554

Re: NARUC Support for Motion for Extension of Time in the proceedings captioned:

In the Matter of High-Cost Universal Service Support, WC Docket No. 05-337

In the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45

Dear Ms. Dortch:

On May 1, 2008, the Independent Telephone and Telecommunications Alliance, the National Exchange Carrier Association, the National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, the United States Telecom Association, and Western Telecommunications Alliance (collectively, "Movants") filed a motion in this docket seeking an extension of the current May 19, 2008 deadline for filing reply comments, to June 9, 2008. The National Association of Regulatory Utility Commissioners (NARUC), on behalf of several of its member commissions, respectfully writes to support the motion.

NARUC is a quasi-governmental nonprofit organization founded in 1889. NARUC's members include those governmental bodies of the fifty States, the District of Columbia, Puerto Rico, and the Virgin Islands, which engage in the regulation of carriers and utilities. NARUC's members have the obligation to assure that such telecommunications services and facilities as may be required by the public convenience and necessity are universally provided at rates that are just and reasonable.

The initial comments address three inter-related Notices of Proposed Rulemaking concerning reform of the federal high-cost universal service program. Over ninety parties filed comments in response to these NPRMs resulting in a record of over 1000 pages filled with complex legal, policy and economic arguments. NARUC's member commissions have limited staff to parse through and analyze these filings. Movants argue that "[a]dditional time is needed

for the associations and other parties to develop well-considered and thorough response to the substantial record amassed in this proceeding.” NARUC agrees.

There is no question that whatever action the FCC takes in these proceedings, it will have a significant impact on related state universal service policy initiatives. The three-week extension sought by the Movants is the minimum the FCC should consider given the voluminous record and the time needed to formulate a proper response.

The motion for extension of time should be granted.

Respectfully submitted,

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