

**Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petitions of AT&T Inc. for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the “ESP Exemption)	Docket No. 08-152
)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s Rules, 47 C.F.R. §1.46, COMPTEL, on behalf of its member companies, hereby respectfully requests that the Commission extend the deadline for the filing of comments and reply comments in the above captioned proceeding for an additional fourteen (14) days beyond the existing comment and reply comment deadlines. Pursuant to this request, comments would be due August 28, 2008, and reply comments would be due September 8, 2008.

On July 24, 2008, the Commission released a public notice¹ seeking comments on AT&T’s petition asking the Commission to declare on an interim basis that IP-to-PSTN and PSTN-to-IP traffic is subject to interstate access for interstate interexchange calls; intrastate access for intrastate interexchange calls (but only to the extent that intrastate access charges are less than or equal to interstate access charges); and, reciprocal

¹ FCC Public Notice, DA 08-1725, July 24, 2008.

compensation for “traffic that is not access traffic.”² AT&T has asked the Commission to also declare that the practice of treating IP-PSTN traffic as local, while at the same time treating PSTN-IP traffic as interexchange, is an unjust and unreasonable practice in violation of sections 201 and 202 of the Communications Act. In addition, AT&T filed waiver requests, which if granted, would allow AT&T to increase its interstate subscriber line charges (SLCs) and interstate originating access charges to offset any reductions in terminating intrastate access charges.

The scope of the issues raised in the above referenced proceeding provides good cause for granting the extension. While AT&T has characterized the petition as a request for interim action, resolution of the petition will likely have a long term impact on critical aspects of intercarrier compensation reform. Parties need additional time to consider and provide comments on the important issues raised by AT&T’s petition, so that the Commission is able to make a decision based on input from affected industry participants. Parties, including AT&T, will not be prejudiced by the additional time.³

For the foregoing reasons, COMPTTEL respectfully requests that the Commission grant this Motion and postpone the comment and reply comment filing deadlines by 14 days from the present deadlines.

² See Petition of AT&T Inc. for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the “ESP Exemption,” WC Docket No. 08-152, July 17, 2008 (AT&T Petition”).

³ The rulings sought in this petition do not include traffic bound for a dial-up Internet service provider (ISP), see *AT&T Petition* at p. 4, n. 12. Therefore the Commission’s decision on this petition is not necessary for the Commission’s compliance with the Court of Appeals for the DC Circuit Writ of Mandamus directing the Commission to provide a legal rationale for its rules regarding intercarrier compensation for ISP-bound traffic no later than November 5. See *In re: Core Communications, Inc.*, No. 07-1446, 2008 WL 2649636 (D.C. Cir. July 8, 2008).

Respectfully Submitted,

/s/

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