

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20544**

\_\_\_\_\_ )  
*In the Matter of* )

*Petition of AT&T Inc. for Interim* )  
*Declaratory Ruling and Limited Waivers* )  
*Regarding Access Charges and the* )  
*ESP Exemption* )  
\_\_\_\_\_ )

**CC Docket Nos. 08-152**

**[DA 08-17125 Rel. 07/24/2008]**

**MOTION OF THE  
NATIONAL ASSOCIATION OF REGULATORY UTILITY COMMISSIONERS  
FOR EXTENSION OF TIME**

Pursuant to Rule 1.46 of the Federal Communications Commission's ("FCC" or "Commission") Rules of Practice and Procedure, 47 C.F.R. § 1.46 (2007), the National Association of Regulatory Utility Commissioners (NARUC), on behalf of several of its member commissions, respectfully files this motion requesting an extension of the comment cycle for the *Petition of AT&T Inc. for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the ESP Exemption (Petition)*. Currently the comment cycle requires initial comments on August 14, 2008 and reply comments on August 25, 2008. NARUC requests the FCC extend the time for all initial comments to August 28, 2008 and to correspondingly extend the time for reply comments to September 11, 2008. In support of this request, NARUC states as follows:

## I. NARUC'S INTEREST

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 mission is to improve the quality and effectiveness of public utility regulation in America. More specifically, NARUC is composed of the State officials charged with the duty of regulating the telecommunications common carriers within their respective borders. As such, they 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. As discussed below, the FCC's proposed action, insofar as it directly affects end-user rate structures/fees accessed for basic service, and has some preemptive elements, clearly impact upon this obligation. AT&T fifty-one page petition raises issues that have drawn the interest of a number of NARUC's member commissions. As a result of that interest, on a conference call earlier today, the undersigned was instructed to seek an extension of the comment cycle in this proceeding. The short time between the notice and the comment deadlines has not given interested States adequate time to study the proposal and also go through the required clearance procedures.

## II. BACKGROUND

NARUC and its member commission have a long held and obvious interest in intercarrier compensation, including any proposal that could effectively shift costs into the intrastate jurisdiction. The proposal explicitly suggests increases in the subscriber line charges and preemption of intrastate access charges that are not at parity with interstate levels for any IP terminating traffic. Any adjustments to intercarrier compensation, even an "interim" one, will

have clear impacts on State universal service policy. Indeed, NARUC's members' intense interest in the topic of intercarrier compensation generally resulted in the creation of the separate task force five years ago to comprehensively examine this and related issues.

### **III. NEED FOR RELIEF**

The AT&T proposal is troubling at several levels and many of NARUC's members lack the staff resources to complete an analysis of the proposal, and get it through required State Commission approval procedures, in the time provided. This plan (i) obviously raises issues of concern to the NARUC's state commission membership and (ii) could impact upon these members' ability to adhere to their respective mandates to serve the public interest. No other participant's filed initial and reply comments can adequately represent the viewpoint of those NARUC's members that plan to file in this proceeding.

This viewpoint is necessary to fully illuminate the issues raised by this proposal and assure a complete record upon which to base a decision. Hence, granting the requested extension will serve the public interest by ensuring State commissions continued full participation.

### **IV. CONCLUSION**

Accordingly, because of the critical importance of the issues raised by this proposal and the clear need for additional time to adequately review and analyze the 51 page proposal submitted, NARUC respectfully requests the FCC extend the time for all initial comments approximately an additional month to August 28, 2008 and to correspondingly extend the time for reply comments to September 11, 2008.

**Respectfully Submitted,**

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