

**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
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Universal Service Contribution Methodology)	WC Docket No. 06-122
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Implementation of the Local Competition Provisions in the Telecommunications Act of 1996)	CC Docket No. 96-98
)	
Developing a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Intercarrier Compensation for ISP-Bound Traffic)	CC Docket No. 99-68
)	
IP-Enabled Services)	WC Docket No. 04-36

MOTION FOR EXTENSION OF TIME

Rural Cellular Association (“RCA”), by its attorneys, and pursuant to 47 C.F.R. § 1.46 of Commission’s rules, hereby requests that the FCC extend the reply comment deadline established in the above-captioned proceeding for an additional fourteen (14) days in order to give interested parties sufficient time to adequately analyze and respond to information submitted by commenters in this proceeding.

On November 5, 2008, the Commission released an Order on Remand and Report and Order and Further Notice of Proposed Rulemaking in the above-captioned proceeding (“Order”).¹ Comments on the Order are due today – November 26, 2008 – 14 days following the Order’s publication in the Federal Register.² Reply comments are due to be filed in 7 days -- on December 3, 2008.³

Between November 26, 2008 and December 3, 2008, there are four business days as a result of the Thanksgiving Day holiday. Virtually every interested party in this proceeding will file comments on November 26, 2008 via the Commission’s Electronic Comment Filing System (“ECFS”). Because many commenters will file late in the day on Wednesday, November 26, many comments are not likely to be posted on ECFS until Friday, November 28, 2008 and not necessarily early in the day. Dozens of comments are expected to be filed, in one of the most complicated and controversial proceedings the Commission has ever undertaken.

Parties intending to file reply comments will be expected to read through what will undoubtedly be hundreds, if not thousands of pages of comments, develop positions, and provide coherent responses between Friday, November 28, 2008 and Wednesday December 3, 2008. This short period of time appears unreasonable and insufficient to provide parties with an adequate opportunity to provide comment as required by 5 U.S.C. § 553(d).

Since October 14, 2008, the Commission has placed not one, but three significant proposals before the industry to consider. In addition, the specifics of each proposal were not

¹ See *In the Matter of High-Cost Universal Service Support, Federal-State Joint Board on Universal Service*, Order on Remand and Report and Order and Further Notice of Proposed Rulemaking, WC Docket No. 05-337, CC Docket No. 96-45, FCC 08-262 (rel., Nov. 5, 2008).

² Order at p. 1.

³ *Id.*

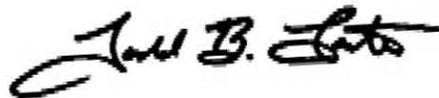
released to the public until November 5, 2008. Moreover, from informal discussions with other parties, we can expect a plethora of new proposals to be presented in the initial comment round.

There is insufficient time to rationally assess the many proposals expected to be submitted and provide the Commission with meaningful comment in the reply round. Given that there are several major reforms proposed (intercarrier compensation, universal service contributions and distributions), as well as many tertiary issues within each, it is unreasonable to expect industry participants to respond within such a compressed time frame.

For the foregoing reasons, RCA respectfully requests that the FCC extend the reply comment deadline in this proceeding by fourteen (14) days to allow interested parties additional time to adequately review and consider the numerous comments that were filed today.

Respectfully submitted,

RURAL CELLULAR ASSOCIATION



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