

**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

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

United States Cellular Corporation (“U.S. Cellular”), by counsel, hereby files these comments in support of the Motion for Extension of Time, filed by the Rural Cellular Association (“RCA”) in the above-referenced dockets on Wednesday, November 26, 2008. RCA requests a fourteen (14) day extension of time to file reply comments.

As of this date, U.S. Cellular has begun the review of well over 100 comments filed in the above-captioned dockets. Many commenters, including NARUC, the Missouri Public Service Commission, the Pennsylvania Public Utility Commission, and the Washington Utilities and Transportation Commission note the extraordinary difficulty in reviewing the voluminous record and preparing reply comments that would be truly useful to the agency.

U.S. Cellular shares those views. Reform of intercarrier compensation and universal service mechanisms is the most technically complex exercise the FCC will undertake. Unlike many other areas within the FCC's expertise, which can be analyzed on a stand-alone basis, intercarrier compensation and universal service are an intertwined mechanism that require literally scores of decisions to be made, each with potentially unintended consequences.

If the Commission is to take up comprehensive reform at its December 18, 2008 meeting, there will be too little time to analyze the many comments and provide a coherent response. Moreover, the December 3 deadline all but ensures that various stakeholders will not have an opportunity to work with each other to find common ground. Alternatively, if the Commission intends to take up reform with an item on circulation, to be adopted some time before January 20, 2009, then an extension of time through December 17, 2008 will not prejudice the Commission's deliberative process, which is ongoing.

We note for example that CostQuest Associates submitted 230 pages of material discussing how a model approach could be used to determine carrier costs. U.S. Cellular offers no comment on the substance of CostQuest's submission here (as we have yet to fully digest it) other than to note that U.S. Cellular suggested the use of models as one of the possible avenues for reform. While it is by no means clear that there would be time to implement models between now and December 18 (or that it could be done without a further notice) surely the current

deadline to provide the Commission with coherent advocacy on the model approach is too short to make our efforts meaningful, given that companies need time to hold internal discussions and approve policy positions.

In sum, U.S. Cellular supports RCA's Motion, and the concerns echoed by NARUC and other state public utility commissions.

Respectfully submitted,

UNITED STATES CELLULAR CORPORATION



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