

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)	CC Docket No. 96-45
on Universal Service)	
)	
Lifeline and Link Up)	WC Docket No. 03-109
)	
Universal Service Contribution)	WC Docket No. 06-122
Methodology)	
)	
Numbering Resource Optimization)	CC Docket No. 99-200
)	
Implementation of the Local)	CC Docket 96-98
Competition Provisions in the)	
Telecommunications Act of 1996)	
)	
Developing a Unified Intercarrier)	CC Docket 01-92
Compensation Regime)	
)	
Intercarrier Compensation for ISP-Bound)	CC Docket 99-68
Traffic)	
)	
IP-Enabled Services)	WC Docket No. 04-36
_____)	

**Arizona Corporation Commission’s Comments in Support of
The National Association of State Utility Consumer Advocates’
Motion for an Extension of Time**

On November 28, 2008, the National Association of State Utility Consumer Advocates (“NASUCA”) filed a motion asking the Federal Communications Commission (“FCC” or “Commission”) for an extension of time to file reply comments on the Further Notice of Proposed Rulemaking (“FNOPR”) released by the Commission on November 5, 2007. The Commission allowed only 14 days for initial comment (after publication in the Federal Register on November 12, 2008) and only 7 days for reply comment.

NASUCA points out in its comments that "...[t]here were over 120 separate comments filed; many of them were voluminous."¹ NASUCA also states that it estimates that the last 75 comments filed totaled more than 2,000 pages, and that many of the comments were not available on-line until November 27, a federal holiday.²

The Arizona Commission supports NASUCA's request for an extension of the reply comment deadline until December 24, 2008. If the FCC believes that the 21 days requested by NASUCA is too long, the Arizona Commission would respectfully request that the deadline for reply comments be extended for a two week period or until December 17, 2008. The Arizona Commission is a relatively small agency and was unable to file initial comments because of the abbreviated comment cycle established by the FCC and the Thanksgiving holiday. The Arizona Commission would like to offer substantive suggestions on several of the reform proposals set forth in the Attachments to the FCC's FNOPR released on November 5, 2008, in late-filed initial comments and reply comments. However, because of the voluminous nature of the initial comments together with the Thanksgiving holiday, our agency will find it extremely difficult if not impossible to meet the 7 day turn-around time (in a meaningful fashion) for reply comments.

Thank you for your consideration of NASUCA's request and of our comments in support of NASUCA's request for a short extension of time to file reply comments.

RESPECTFULLY SUBMITTED this 1st day of December, 2008.

/s/ Maureen A. Scott

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¹ NASUCA Motion at p. 2.

² *Id.* at 2-3.