

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

In the Matter of)	
)	
Development of Nationwide Broadband Data to)	WC Docket No. 07-38
Evaluate Reasonable and Timely Deployment of)	DA 08-1586
Advanced Services to All Americans, Improvement of)	
Wireless Broadband Subscription Data, and)	
Development of Data on Interconnected Voice over)	
Internet Protocol (VoIP) Subscribership)	

COMMENTS IN SUPPORT OF REQUEST FOR EXTENSION

The Western Telecommunications Alliance (“WTA”) submits its comments supporting the February 3, 2009 request of the National Telecommunications Cooperative Association (“NTCA”), the Rural Telecommunications Group (“RTG”) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (“OPASTCO”) for a 120-day extension (until Tuesday, June 30, 2009) of the present Monday, March 2, 2009 deadline for the filing of the newly revised and approved Local Telephone Competition and Broadband Reporting Form (FCC Form 477) by small telecommunications carriers.

The Western Telecommunications Alliance

WTA is a trade association that represents approximately 250 rural telephone companies operating in the 24 states located west of the Mississippi River. WTA members are generally small companies that serve sparsely populated rural areas with relatively small staffs that are responsible for a broad variety of technical, administrative and customer service functions.

The Requested Extension Should Be Granted

The revised Form 477 requires the submission of substantial new broadband deployment information at significantly new and more complex levels of detail. For example, the new Part

VI alone requires the submission, by technology and Census Tract, of broadband connection information for combinations of nine different upload information transfer rates and eight different download information transfer rates. Small telecommunications carriers will not only have to determine the numbers of their broadband connections for each technology for 72 different upload-download speed combinations (as well as the percentage of connections in each combination that constitute “residential” customers), but will have to compile this information on the basis of Census Tract areas for which most have not previously kept data. The new FCC Form 477 therefore imposes very substantial, complex and time-consuming new recordkeeping and reporting requirements on small telecommunications carriers.

In addition, the new FCC Form 477 must be filed electronically with the Commission. Because the required information is so voluminous and detailed, it is going to be very difficult for small telecommunications carriers to obtain substantial filing assistance from their attorneys, consultants and other advisors, particularly between now and the existing March 2 deadline. Rather, the small staffs of such carriers will be forced to deal hurriedly with a brand new electronic filing system with which they are unfamiliar. While small carriers will do their best to make complete and accurate submissions, the combined circumstances of substantial existing staff workloads, an unfamiliar new form and filing mechanism, and a short filing period are bound to produce substantial unintended errors, omissions and oversights.

Finally, the new electronic FCC Form 477 was still not available on the Commission’s website as of the 5:30 PM Eastern Standard Time close of business on Thursday, February 5, 2009. It was not approved by the Office of Management and Budget (“OMB”) until Friday, January 30, 2009. Hence, as of a mere 16 business days before the existing March 2 deadline, carriers can download a presumably accurate paper copy of the new FCC Form 477 and

instructions from the OMB website, but cannot yet begin working with the electronic filing on the Commission's website.

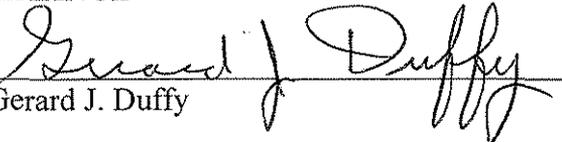
WTA supports the purpose of the FCC Form 477, which is to inform the Commission of the extent of broadband deployment and to enable it to continue to develop and maintain appropriate broadband policies. In recognition of the importance of such broadband policies, WTA believes that the 120-day extension requested by NTCA, RTG and OPASTCO is necessary to enable the small staffs of small telecommunications carriers to generate or collect the substantial new and complex information required by the newly revised and approved FCC Form 477 in a complete and accurate fashion, and to report such voluminous information in an equally complete and accurate fashion via the new electronic filing format after it becomes available. Unless the Commission affords substantial and sufficient additional time for the first-time submission of the new FCC Form 477, WTA believes that much of the hurriedly-prepared broadband deployment information it will receive is likely to be incomplete and inaccurate, and consequently relatively useless (if not misleading) as a guide for developing and implementing effective broadband policies.

Therefore, WTA believes that good cause exists for grant of the 120-day extension sought by NTCA, RTG and OPASTCO, and requests that such extension be granted.

Respectfully submitted,

Blooston, Mordkofsky, Dickens,
Duffy & Prendergast
2120 L Street, NW (Suite 300)
Washington, DC 20037
Phone: (202) 659-0830
Facsimile: (202) 828-5568
Email: gjd@bloostonlaw.com

**THE WESTERN TELECOMMUNICATIONS
ALLIANCE**

By 
Gerard J. Duffy

Dated: February 6, 2009