

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

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

REQUEST FOR EXTENSION

Texas Statewide Telephone Cooperative, Inc. (TSTCI)¹ supports the Request for Extension² filed by the National Telecommunications Cooperative Association (NTCA), the Rural Telecommunications Group (RTG) and the Organization for the Promotion and Advancement of Small Telecommunications Companies (OPASTCO) (collectively, the Rural Associations) for a 120 day extension of time for small broadband providers to complete and file the Form 477 Broadband report.

¹ TSTCI is an association representing 22 telephone cooperatives and 16 commercial companies, all small rural incumbent local exchange companies in the State of Texas. (Please see Attachment I for a list of member companies).

² *In the Matter of Development of Nationwide Broadband Data to Evaluate Reasonable and Timely Deployment of Advanced Services to All Americans, Improvement of Wireless Broadband Subscribership Data, and Development of Data on Interconnected Voice over Internet Protocol (VoIP) Subscribership*, WC Docket No. 07-38, Rural Associations Request for Extension, February 3, 2009 (Request).

As the Rural Associations state in their Request, the new Form 477 is a significant departure from the form small broadband providers are accustomed to³, and since the new Form 477 it is not yet available on-line at the time of this writing, the upcoming March 1 deadline may create significant logistical problems for TSTCI member companies. Many TSTCI member companies have small staffs, and approximately half of TSTCI member companies have fewer than 30 full-time employees. The new Form 477 is likely to place a burden on these companies to complete the Form 477 by the March 1 deadline.

Many of the small rural broadband providers represented by TSTCI and the Rural Associations are not experienced with tracking broadband customers by census block as required in the new Form 477. In fact, most TSTCI member companies do not currently track broadband customers by census block, and given that many rural broadband customers lack street addresses, the census block data required for the Form 477 may not be readily available.

TSTCI agrees that the brief extension of time requested by the Rural Associations will help ensure that the rural broadband providers have the opportunity to collect and submit accurate and useful data to the Commission. TSTCI also agrees that while waivers are available for providers to seek individualized relief from the form and its deadline, a 120-day extension will enable small providers to submit the required information without undue stress and save a large number of providers from spending valuable resources on waiver requests.

³ Request, p. 2.

TSTCI, like the Rural Associations, understands the importance of the Commission's broadband data collection efforts and supports these efforts. TSTCI contends that the Commission's grant of the requested extension will only serve to facilitate the process of gathering this important information.

Respectfully submitted,

Texas Statewide Telephone Cooperative, Inc.

A handwritten signature in black ink that reads "Cammie Hughes". The signature is written in a cursive, flowing style.

Cammie Hughes
Authorized Representative

TEXAS STATEWIDE TELEPHONE COOPERATIVE, INC.

Alenco Communications, Inc.
Big Bend Telephone Company, Inc.
Brazos Telecommunications, Inc.
Brazos Telephone Coop., Inc.
Cameron Telephone Company
Cap Rock Telephone Coop., Inc.
Central Texas Telephone Coop., Inc.
Coleman County Telephone Coop., Inc.
Colorado Valley Telephone Coop., Inc.
Community Telephone Company, Inc.
Cumby Telephone Coop., Inc.
Dell Telephone Coop., Inc.
E.N.M.R. Telephone Coop., Inc.
Eastex Telephone Coop., Inc.
Electra Telephone Company
Etex Telephone Coop., Inc.
Five Area Telephone Coop., Inc.
Ganado Telephone Company, Inc.
Hill Country Telephone Cooperative, Inc.
Industry Telephone Company, Inc.
La Ward Telephone Exchange, Inc.
Lake Livingston Telephone Company
Lipan Telephone Company, Inc.
Livingston Telephone Company
Mid-Plains Rural Telephone Coop., Inc.
Nortex Communications, Inc.
Panhandle Telephone Coop., Inc.
Peoples Telephone Coop., Inc.
Poka Lambro Telephone Coop., Inc.
Riviera Telephone Company, Inc.
Santa Rosa Telephone Coop., Inc.
South Plains Telephone Coop., Inc.
Tatum Telephone Company
Taylor Telephone Coop., Inc.
Wes-Tex Telephone Coop., Inc.
West Plains Telecommunications, Inc.
West Texas Rural Tel. Coop., Inc.
XIT Rural Telephone Coop., Inc.