

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

In the Matter of	)	
	)	
Development of Nationwide Broadband Data	)	WC Docket No. 07-38
to Evaluate Reasonable and Timely	)	DA 08-1586
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	)	

**REQUEST FOR EXTENSION**

COMES NOW, Bixby Telephone Company, Canadian Valley Telephone Company, Cherokee Telephone Company, Cross Telephone Company, Hinton Telephone Company, Panhandle Telephone Cooperative, Inc., Pioneer Telephone Cooperative, Inc. Shidler Telephone Company and South Central Telephone Association, Inc. (the "Rural Telephone Companies"); and Cellular Network Partnership and Panhandle Telecommunication Systems, Inc., (collectively, the "Rural Telecommunications Companies" or "RTCs")<sup>1</sup> and hereby request that the Federal Communications Commission ("FCC" or "Commission") grant a 45 day extension of time from the date the on-line report is available for completion, for these small broadband providers to complete and file the Form 477 Broadband report.

The RTCs acknowledge the importance of the information being sought by the FCC and recognize that it is imperative to quickly and accurately compile information regarding,

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<sup>1</sup> The Rural Telephone Companies, are "rural telephone companies" as defined in 47 U.S.C. § 153(37), and serve areas of rural Kansas and Oklahoma. Cellular Network Partnership is a small rural wireless provider serving rural areas in Kansas and Oklahoma. Panhandle Telecommunication Systems, Inc. is a small rural wireless provider and competitive local exchange company providing service to rural areas of Kansas, Oklahoma and Texas. Collectively the companies are dedicated to providing competitive modern

among other information, where broadband service is being used, census tract information, speed in which data is uploaded and downloaded, and the technology being used to provide broadband. The new Form 477 is a significant departure from the previous form which requires the collection of vast amount of additional data and according to the FCC's estimates, the new Form 477 will require an average of 337 hours, or 42 full business days, to complete. The Form is also in a new format and must be completed utilizing the FCC's graphical user interface that has not been used in the past. The new Form was only recently approved by the Office of Management and Budget, and the executable Form is still not available from the FCC's website.

The RTCs are small businesses formed to bring services to rural areas where large companies with vast resources had no interest in serving. As small and prudently operated businesses, the independent LECs do not maintain vast resources of unused or underused personnel that can easily be quickly deployed to special projects. Their personnel perform a vast majority of functions and they do not have large regulatory departments dedicated to reporting like the large carriers. To amortize costs of some necessary functions, rural companies often utilize the resources of consulting and advisory firms to assist with matters such as regulatory compliance accounting and reporting - this practice overall reduces the expenses that would otherwise be incurred to maintain internal resources as vast as those maintained by larger carriers serving the more urban areas of the nation. However, these firms represent a multitude of carriers and may not have the resources to complete the FCC 477 for all of their clients timely.

Although the RTCs are fully committed to timely regulatory compliance, and aware of the new Form 477 requirements, the RTCs' reasonably anticipated that the FCC

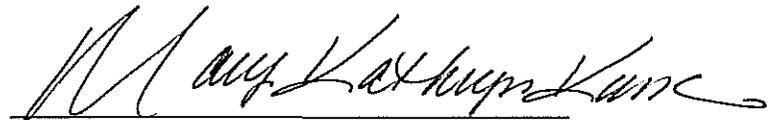
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telecommunications and broadband services and ensuring the economic future of their rural communities.

would provide guidance to make the process and the new requirements efficient and easily accessible; especially with regard to the new requirement to identify the deployment of broadband by census tract. Consistent with that expectation, the FCC released a notice providing guidance on February 12. While the RTCs appreciate the provision of the anticipated guidance, there were only 19 days from the date of the Notice to prepare this new filing which will take many more hours to prepare than the previous Form. The reality is that, as explained above, there is not sufficient time and resources to prepare accurate reports by March 2.

WHEREFORE, the RTCs respectfully request the FCC grant them a 45 day extension from the date the revised form becomes available for completion on the FCC's website, to complete the new Form 477. If any of the RTC's can successfully compile and accurately complete the Form 477 prior to the expiration of the 45 day extension, the Form will be submitted at that time

Respectfully submitted,



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