

**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, Chickasaw Telephone Company and Chickasaw Telecommunications Services, Inc. (collectively "Chickasaw")<sup>1</sup> and hereby requests 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.

Chickasaw is still in the midst of repairing its facilities that were damaged or destroyed by the EF-4 tornado that ripped through their Lone Grove and surrounding exchanges on February 10<sup>th</sup>. The storm claimed eight lives in Lone Grove and injured 46. Approximately 114 homes were destroyed in the storm. Chickasaw personnel have been working around the clock to repair and restore phone service to the affected area and are assisting these affected customers in everyway possible. Due to the tornado and its devastating effects, Chickasaw employees have been pulled from their normal jobs to assist in the storm recovery. Therefore, Chickasaw believes good cause exists to grant it additional time in which to complete the FCC Form 477.

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<sup>1</sup> Chickasaw Telephone Company is a "rural telephone company" as defined in 47 U.S.C. § 153(37), and serve areas of rural southern Oklahoma. Chickasaw Telecommunication Services, Inc. is a small competitive local exchange company providing service to rural and urban areas of Oklahoma. Collectively the companies are dedicated to providing competitive modern telecommunications and broadband services and ensuring the economic future of

Chickasaw acknowledges the importance of the information being sought by the FCC and recognizes that it is imperative to quickly and accurately compile information regarding, 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.

Chickasaw is a small business, formed to bring services to rural areas where large companies with vast resources had no interest in serving. As a small and prudently operated business, Chickasaw does not maintain vast resources of unused or underused personnel that can easily be quickly deployed to special projects. Chickasaw's 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.

Chickasaw is fully committed to timely regulatory compliance, and is aware of the new Form 477 requirements and reasonably anticipated that the FCC would provide guidance to make the process and the new requirements efficient and easily accessible; especially with regard

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their rural communities.

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 Chickasaw appreciates 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, with the storm recovery and additional reasons explained above, there is not sufficient time and resources to prepare accurate reports by March 2.

WHEREFORE, Chickasaw respectfully requests 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 they 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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