

**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)
Americans, Improvement of Wireless)
Broadband Subscriber Data, and)
Development of Data on Interconnected)
Voice over Internet Protocol (VoIP))
Subscribership)
)

REQUEST FOR EXTENSION

BroadvoxGo!, LLC (“BroadvoxGo!”), by counsel, hereby requests that the Federal Communications Commission (“FCC”) grant a sixty (60) day extension to complete and file the new Form 477. The extension is warranted for the following reasons:

1. The new form puts a substantial administrative burden on providers, such as BroadvoxGo!, by requiring a substantial amount of increased data and information that BroadvoxGo! will not be able to gather by March 16, 2009.
2. An extension would be in the public interest as it would allow BroadvoxGo! additional time in which to compile data, thereby ensuring the accuracy of the data and the submission.

As other carriers and their representative associations have recently stated in requesting a similar extension, the new Form 477 requires the collection of vast amounts of data and is a significant departure from the reporting from carriers are accustomed to.

A sixty (60) day extension would not be an overly long period of time given the amount of work that is required by small broadband providers. Due to the delayed release of the form and instructions, providers face significant logistical problems in collecting and reporting the data required in the new Form 477. Most broadband providers do not currently track census tract data nor do they have systems in place to keep track of the data. An extension would allow small broadband providers, such as BroadvoxGo!, to gather the census tract data, which will be labor intensive and administratively burdensome for them, in a more orderly and accurate fashion. 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 Commission has provided this type of extension in the past when doing so would serve the public interest and provide more accurate data.

BroadvoxGo! believes the Commission should grant a sixty (60) day extension to small Broadband providers as it will serve the public interest.

For the reasons above, a short sixty (60) day extension is reasonable and appropriate. The Commission should grant the request.

Respectfully submitted,



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