



April 21st, 2009

VIA ELECTRONIC FILING

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Petition of Alexicon Telecommunications Consulting To Change Form 499A
Reporting Deadline

Dear Ms. Dortch:

Alexicon Telecommunications Consulting respectfully submits the enclosed petition requesting the Federal Communications Commission ("Commission") review and consideration of changing the Form 499A reporting deadline from April 1st to September 1st of each year. Alexicon believes changing this reporting deadline to September 1st will lead to less administrative burdens for rate-of-return regulated companies as well as Commission staff. Changing the current deadline will allow small companies to complete their annual financial audits before the reporting deadline, which is an issue many of these companies are facing today. In addition, moving the deadline will not only assist small companies (with limited staff) in allowing them to complete many other reporting deadlines already in place during the first quarter of each calendar year but will also necessitate these companies having to re-file this report due to incomplete prior period audited financial reporting.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. Please direct any questions regarding this petition to Douglas K. Kitch on behalf of Alexicon Telecommunications Consulting.

Sincerely,

A handwritten signature in black ink, appearing to read "Douglas K. Kitch".

Douglas K. Kitch, CPA, Principal

Enclosure

**Before the
Federal Communications Commission
Washington, D. C. 20554**

In the Matter of:

FCC Form 499A Annual Reporting) CC Docket No. 96-45

PETITION FOR CHANGE OF FORM 499A REPORTING DATE

Alexicon Telecommunications Consulting (“Alexicon”) hereby petitions the Federal Communications Commission (“FCC” or “Commission”) for a change in the reporting date of FCC Form 499A on an ongoing basis.

INTRODUCTION

Alexicon is a professional telecommunications consulting firm providing a range of financial, management and regulatory services to a variety of small rate-of-return regulated ILECs¹. Alexicon’s clients, all serving rural, insular or Native American Tribal lands are subject not only to FCC rules and regulations but are also required to comply with many annual reporting requirements for state regulation and a variety of other federal regulatory agencies. Furthermore, these companies, and most other small rate-of-return regulated ILECs, are also subject to annual reporting to the National Exchange Carrier Association (“NECA”) and the Universal Service Administration Company (“USAC”).² Lastly, these companies are generally required to provide annual audits and reports to the Rural Utilities Service (“RUS”), many of which are required for filing by the end of the first quarter of a calendar year.

¹ All classified as Rural Telephone Companies under the Telecommunications Act of 1996; and each providing telephone exchange service to fewer than 50,000 access lines

² Including the ongoing FCC OIG audits and their related reporting procedures

BASIS FOR PETITION

Currently the FCC requires that Form 499A be completed and filed by April 1 of each year for the prior year reporting period. The completion, review, and filing of this form requires substantial administrative, management, and often accounting/consultant assistance at a time when many other reporting demands are placed upon these ILECs.

Annual audits of most companies' calendar or fiscal year are normally in process during the first quarter of the subsequent calendar year and are probably the most pertinent (and manpower intensive) reporting effort required of ILECs³. These annual financial audits also divert much accounting and management attention from other reporting requirements during this time period. Many companies will not actually complete these annual audits until the April through June timeframe. During this period companies are currently required to complete and file other FCC reports, such as Form 492; Form 507; Form 508; and many state regulatory and financial institution reporting documents. For small companies, these reports often require the same personnel to complete/review them.

Under the current April 1st reporting deadline for Form 499A, there are often instances where incomplete underlying financial information forces ILECs to have to submit revisions to the FCC for Form 499A. These revisions cause the expenditure of extra cost and time to both ILECs and the Commission Staff, which could be greatly reduced or eliminated if a later submission date is selected for the Form 499A filing.

Alexicon requests that the FCC revise the reporting date for Form 499A from the current April 1 submission to September 1. Alexicon contends that the change of submission date will allow for greater initial accuracy; reduce the administrative burden to ILECs; create a more efficient reporting process both in terms of cost and time; provide a more logical submission date⁴; and generally provide some relief from other reporting

³ Annual audits and related reports become the basis of many other required reports, separations studies, tax filings (state & federal), and many other FCC or state regulatory agencies reports

⁴ Since no other reports appear to be based on the completed Form 499A, Alexicon can not note apparent harm to a

requirements.

CONCLUSION

Alexicon submits that good cause and the potential advancement of public interest are demonstrated herein and that the relief of changing the submission date for FCC Form 499A from April 1 to September 1 (on an annual basis) should be granted.

Respectfully submitted,

Alexicon Telecommunications Consulting
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