



benchmarks for meeting that goal,” in order to deliver this plan to Congress by February 17, 2010 in accordance with the American Recovery and Reinvestment Act of 2009 (“Recovery Act”).<sup>3</sup> The Commission directed interested parties to file initial comments in response to the many issues and questions posed by the Commission in the NOI by June 8, 2009, with reply comments due by July 7, 2009.

Predictably, there was a massive response to the Commission’s NOI. There were over 1,700 initial comments filed with the Commission, including those filed by the Movants. Comments were filed by a wide range of interested parties, representing industry (including telecommunications carriers, cable providers, Internet service providers, and broadcasters), federal and state government (such as the Federal Bureau of Investigation and regulatory bodies from California, Massachusetts, New York and Vermont), consumer advocates (such as NASUCA, Consumers Union, Consumers Federation of America, and U.S. PIRG), organized labor (*i.e.*, the Communications Workers of America), media and public information watchdogs (such as Public Knowledge, and Media Access Project), and individual citizens and consumers, to name just some. Many of the initial comments filed with the Commission were very extensive – running tens or hundreds of pages long, including numerous attachments and exhibits.

The thousands of pages of comments filed to date raise obviously important issues related to the development and implementation of a National Broadband Plan, involving fundamental public policy issues whose resolution will affect hundreds of millions of consumers and America’s economic development for years to come. In light of the important legal, economic and policy issues raised in the NOI and the parties’ comments,

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<sup>3</sup> NOI, ¶¶1 & 6; *see also* Pub. L. No. 111-5, 123 Stat. 115 § 6001(k).

the current period for reply comments is simply not adequate to permit the Movants to fully review and respond to other parties' initial comments.

The Movants are well aware of the February 17, 2010 deadline for the Commission to submit its National Broadband Plan to Congress and that time is short. However, the sheer number of comments, and the widely varying views contained in those comments on a multitude of issues and questions posed by the Commission, warrant granting an extension of the Commission's July 7, 2009 deadline for reply comments. The magnitude of the job before the Commission warrants permitting the parties sufficient time to meaningfully review other parties' comments and prepare well-reasoned reply comments where appropriate. Moreover, the Movants believe that an extension of time will improve the content and quality of reply comments the Commission receives, which will in turn allow the Commission to fashion a more complete, thorough and well-reasoned National Broadband Plan to submit to Congress. Finally, even with the requested extension, the Commission will still have over six months to put the finishing touches on that Plan.

For all the foregoing reasons, the Movants request that the Commission grant their motion for an extension of the period for filing reply comments, from July 7 to August 7, 2009.

Respectfully submitted,

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/s/ (original retained per 47 C.F.R. § 1.52)

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Dated: June 18, 2009

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18th day of June, 2009, I caused true and correct copies of the foregoing "*Joint Motion for Extension of Time*" to be served on all parties listed below by electronic filing.

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