

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

In the Matter of)	
)	
Empowering Consumers to Avoid Bill Shock)	CG Docket No. 10-207
)	
Consumer Information and Disclosure)	CG Docket No. 09-158

**JOINT REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT
DEADLINES**

CTIA – The Wireless Association® (“CTIA”), the National Telecommunications Cooperative Association (“NTCA”), the Rural Cellular Association (“RCA”), and the Rural Telecommunications Group, Inc. (“RTG”) (collectively referred to herein as “Trade Associations”) hereby respectfully submit this request for a limited extension of the comment and reply comment deadlines established by the Federal Communications Commission (“Commission”) in the above-captioned proceeding, currently set for December 27, 2010 and January 25, 2011.¹ Pursuant to Section 1.46 of the Commission’s rules, the Trade Associations request a two-week extension of the deadlines such that comments would be due no later than January 10, 2011 and reply comments would be due no later than February 8, 2011. A limited two-week extension is in the public interest to allow interested parties to meaningfully address the issues raised by the Commission’s *Bill Shock NPRM* and provide a robust record.

In the *Bill Shock NPRM*, the Commission proposes rules that would require mobile service providers to offer usage alerts and other information that will assist consumers in

¹ See *Empowering Consumers to Avoid Bill Shock*, CG Docket No. 10-207, Notice of Proposed Rulemaking, FCC 10-180 (rel. Oct. 14, 2010) (“*Bill Shock NPRM*”); *Consumer and Governmental Affairs Bureau Announces the Dates for Filing Comments and Reply Comments Regarding “Bill Shock,”* CG Docket No. 10-207, Public Notice, DA 10-2263 (CGB rel. Nov. 30, 2010).

avoiding unexpected charges on their bills, including disclosures of any tools or services they offer that allow subscribers to set usage limits or monitor usage balances.² The Commission also seeks comment on “real-time” alerts, multi-line family plan alerts, specific usage levels that should trigger an alert, international and roaming notifications, the impact on critical communications (*e.g.*, E911 access), disabilities access concerns, and implementation timelines.³ In addition, the Commission seeks comment on the legal authority for such rules and the types of wireless services that should be subject to any new requirements.⁴

Many wireless service providers are introducing new services, pricing plans, sales promotions, and other choices for consumers over the next several weeks, particularly for the holiday season. They continue to explore and implement pro-consumer initiatives as part of the revised CTIA Consumer Code, set to go into effect on January 1, 2011. Granting an additional two weeks for comments and reply comments would thus allow parties to provide more current and relevant data to the Commission.

Moreover, the FCC’s novel proposals raise a number of complex legal, technical, economic, and factual issues requiring detailed study and analysis, particularly difficult implementation issues. The proposals implicate significant effects on the Trade Associations members and the wireless ecosystem, including billing and customer support vendors, application developers and equipment providers. In addition, as the Commission recognizes, “mobile providers may need to revise their existing systems” to effectuate the Commission’s proposals.⁵ Providers thus need additional time to review the Commission’s proposals (and their

² *Bill Shock NPRM* at ¶ 1 and Appendix A.

³ *Id.* at ¶¶ 20-24.

⁴ *Id.* at ¶¶ 26-28.

⁵ *Id.* at ¶ 23.

own systems) and craft solutions that address the Commission’s goal of empowering consumers to avoid unexpected fees. To facilitate the development of a full and informed record, therefore, the Commission should grant parties an additional two weeks to address meaningfully and thoroughly the issues raised in the *Bill Shock NPRM*.

The current comment and reply comment deadlines also occur around several key holidays, including Christmas, Kwanzaa, New Year’s Day, and Martin Luther King Jr. Day. These are some of the busiest travel and vacation holidays, and many of the business and economic analysts, technical staff, and legal personnel that are responsible for preparing comments – and evaluating the record and preparing reply comments – in this proceeding will be unavailable during this time. Thus, an additional two weeks is warranted to ensure that all parties have an opportunity to dedicate key resources to providing full input to the Commission in this important and timely proceeding.

CTIA recognizes that requests to extend filing deadlines are not routinely granted, but the Commission often has found that a comment pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission’s consideration.⁶ Consistent with Commission precedent, a limited, two-week extension of the

⁶ See, e.g., Wireless E911 Location Accuracy Requirements, PS Docket No. 07-114, Order, DA 10-2267, ¶ 3 (PSHSB rel. Dec. 1, 2010) (“*2010 E911 Extension*”) (granting an extension “to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments”); *Twenty-One Day Extension of Time to File Reply Comments on Wireless Innovation and Investment Notice of Inquiry*, Public Notice, 24 FCC Rcd 12579, 1-2 (WTB and OET 2009) (finding that granting a limited extension serves the public interest because it “would be beneficial to the development of a complete record on the issues”); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, 24 FCC Rcd 8490, 1 (WTB 2009) (same); *Media Bureau Grants Extension of Time to File Comments and Reply Comments in Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, 23 FCC Rcd 3741, 2 (MB 2008) (“we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto”); *Reexamination of*

comment and reply comment deadlines is appropriate to enable affected stakeholders to more thoroughly evaluate the issues raised by the proceeding and provide more relevant analysis for the Commission. Moreover, no parties will be prejudiced by such an extension.

For the foregoing reasons, an extension of time will help ensure the development and submission of a more robust and meaningful record for the Commission to consider.

Respectfully submitted,

CTIA – THE WIRELESS ASSOCIATION®

By: /s/ Brian M. Josef

Brian M. Josef
Director, Regulatory Affairs
1400 16th Street, NW, Suite 600
Washington, DC 20036
(202) 785-0081

**NATIONAL TELECOMMUNICATIONS
COOPERATIVE ASSOCIATION**

By: /s/ Jill Canfield

Jill Canfield
Director, Legal & Industry
4121 Wilson Blvd, 10th Fl
Arlington, VA 22203
(703) 351-2020

RURAL CELLULAR ASSOCIATION

By: /s/ Rebecca Murphy Thompson

Rebecca Murphy Thompson
General Counsel
805 15th Street, NW, Suite 401
Washington, DC 20005
(202) 449-9866

RURAL TELECOMMUNICATIONS GROUP, INC.

By: /s/ Caressa D. Bennet

Caressa D. Bennet
General Counsel
10 G Street, NE, Suite 710
Washington, DC 2002
(202) 551-0025

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Roaming Obligations of Commercial Mobile Radio Service Providers, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003).