

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Link-Up)	WC Docket No. 03-109

MOTION FOR EXTENSION OF TIME

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August 4, 2011

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, The National Association of State Utility Consumer Advocates and the New Jersey Division of Rate Counsel (collectively, "Consumer Advocates") hereby request that the Commission extend the deadline for filing of comments and reply comments set forth in Public Notice (DA 11-1348), dated August 3, 2011 regarding various proposals for reforming Universal Service and Intercarrier Compensation. Consumer Advocates request a nineteen (19) day extension until September 12, 2011 to file comments and a thirty (30) day extension to September 30, 2011 to file reply comments.

The Public Notice raises numerous issues in nineteen (19) pages for which additional comments are requested. The Public Notice allows fifteen (15) working days from the time it went on the internet until parties must file their initial comments and five (5) working days to reply to the comments received from all of the parties, which is an unreasonable time when viewed with the complexity of the issues presented for comment.¹ Consumer Advocates note that the issues presented for comment include a new model that has not previously been made public that presumably would be used by the Commission to distribute the \$4.5B CAF for the next decade, if not longer. The scope of the requested comments raise the Notice of Proposed Rulemaking (NPRM) to the level of a major NPRM which generally justifies a 60/90 day comment and reply comment cycle.

Consumer Advocates need additional time to consider and provide comment on the important issues raised by the Public Notice. Once implemented, the rules that the Commission adopts will have far reaching impact on the industry as a whole. Given the importance and

¹ / In fact, the Twenty-two working days set for all comments makes meaningful comments impossible.

complexity of this rulemaking, the limited additional time requested will enable a full and careful analysis of these issues without causing undue delay in the process.

For the foregoing reasons, Consumer Advocates respectfully requests that the Commission grant this motion and grant the extension requested.

Respectfully submitted,

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