

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

In the Matter of	)	
	)	
Acceleration of Broadband Deployment	)	
By Improving Policies Regarding	)	WC Docket No. 11-59
Public Rights of Way and	)	
Wireless Facilities Siting	)	
	)	

**OPPOSITION TO MOTION FOR EXTENSION OF TIME**

Level 3 Communications, LLC (“Level 3”) hereby opposes the National Associations’ Motion for an Extension of Time, which requests that the Commission extend the 45-day reply comment period by an additional 62 days to October 31, 2011. *See* Motion for an Extension of Time at 2 (WC Docket 11-59) (filed Aug. 5, 2011). Level 3 urges the Commission to deny the motion because uncertainty about the limits related to rights-of-way management under § 253 is already harming broadband deployment and the provision of communications services. This uncertainty will continue to cause harm until the Commission takes action to set clear limits. Extending the reply deadline as the National Associations request would harm the public interest by extending the period during which this harm continues.

The National Associations assert that an extension is necessary to enable them to inform state and local governments about the issues at stake and the arguments presented in the comments filed last month. But there is simply no reason that doing so should require a reply comment period that stretches to 107 days – particularly since the core issues have been on the table in active Commission proceedings since July 2009, when Level 3 filed a petition under § 253. Moreover, parties have already had 102 days to file comments and the Notice of Inquiry already affords an additional 45 days to file replies.

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For these reasons, Level 3 urges the Commission to deny the Motion for an Extension of Time. In the event the Commission determines that an extension is warranted, Level 3 requests that it be limited to a far shorter period than the National Associations request.

Respectfully submitted,

/s/

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August 11, 2011