

**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
FOR FILING REPLY COMMENTS**

Charlie Acquard, Executive Director
NASUCA
8380 Colesville Road, Suite 101
Silver Spring, MD 20910
Phone (301) 589-6313
Fax (301) 589-6380

Stefanie A. Brand
Director
Division of Rate Counsel
Christopher J. White
Deputy Rate Counsel
P.O. Box 46005
Newark, NJ 07101
Phone (973) 648-2690
Fax (973) 624-1047
www.rpa.state.nj.us
njratepayer@rpa.state.nj.us

August 25, 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 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 twelve (12) day extension until September 12, 2011 to file reply comments.

The Public Notice allows five (5) working days to reply to the initial comments. On August 24, 2011, 126 initial comments were filed exceeding over 2,800 pages. Due to the number of initial comments and the sheer number of pages, coupled with the complexity of the issues a short extension would serve the public interest.

Consumer Advocates need additional time to review the voluminous initial comments and formulate thoughtful and detailed response thereto on the important issues raised in the initial comments in response to the Public Notice. Once implemented, the rules that the Commission adopts will have far reaching impact on the industry as a whole and consumers. Given the importance and 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. NASUCA, in its initial comments, has comprehensively addressed the issues in this important docket. In order to reply to other parties in a similar fashion, additional time is necessary.

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

Respectfully submitted,

Charlie Acquard, Executive Director
NASUCA

Charlie Acquard
8380 Colesville Road, Suite 101
Silver Spring, MD 20910
Phone (301) 589-6313
Fax (301) 589-6380

Stefanie A. Brand
Director
Division of Rate Counsel
Christopher J. White
Deputy Rate Counsel
P.O. Box 46005
Newark, NJ 07101
Phone (973) 648-2690
Fax (973) 624-1047
www.rpa.state.nj.us
njratepayer@rpa.state.nj.us

August 25, 2011