

**Before the
Federal Communications Commission
Washington, DC 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
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208
)	
Mobility Fund Phase I Auction)	AU Docket No. 12-25

MOTION FOR EXTENSION OF TIME

The Rural Telecommunications Group, Inc. (“RTG”), by its attorneys and pursuant to 47 C.F.R. § 1.46 of the Federal Communications Commission’s (“FCC” or “Commission”) Rules, respectfully moves for an extension of time to file comments in the above-captioned proceeding. Although the Commission does not routinely grant motions for extension of time, failure to do so in this instance would result in an incomplete record that would prevent the Commission from being able to engage in reasoned decision making.

On February 2, 2012, the Wireline Competition Bureau and Wireless Telecommunications Bureau (the “Bureaus”) released an *Auction 901 Public Notice*¹ seeking comment on proposed procedures and eligible areas for the \$300 million Mobility Fund Phase I reverse auction, designated Auction 901. The Bureaus also established a short, 22-day comment period (*i.e.*, until February 24, 2012) and provided, among other things, a preliminary list of potentially eligible census blocks. This preliminary list was based on data provided by American Roamer in October of 2011. The Bureaus indicated that they would release a revised list of potentially eligible census blocks once they had completed their analysis of more current (January 2012) American Roamer data. The revised list was just released on February 10, 2012, eight days after the release of the *Auction 901 Public Notice*, and interested parties now have a mere 14 days to examine the census blocks identified in the revised list and prepare comments.

RTG’s members have significant reservations and concerns regarding the accuracy and reliability of the information and tools that the Bureaus have supplied thus far with respect to Auction 901. RTG questions the accuracy and reliability of the American Roamer data used to prepare the preliminary list of potentially eligible census blocks, and once RTG and its members complete their review and evaluation of the just released American Roamer data, RTG anticipates that it will find similar issues with respect to accuracy and reliability that it will need to bring to the Commission’s attention. Moreover, contemporaneous with the release of the revised list, the Bureaus have released a new interactive map that apparently corresponds to American Roamer data current as of January 2012. Accordingly, because the map relies on inaccurate and unreliable data, it too cannot be relied upon. In the meantime, RTG members

¹ Mobility Fund Phase I Auction Scheduled for September 27, 2012; Comment Sought on Competitive Bidding Procedures for Auction 901 and Certain Program Requirements, AU Docket No. 12-25, *Public Notice*, DA 12-121 (rel. February 2, 2012) (“*Auction 901 Public Notice*”).

have had to purchase separate resources to compensate for these deficiencies. The comment window currently allotted by the Bureaus is insufficient to allow RTG's members to utilize these separate resources to effectively and comprehensively compare coverage discrepancies.

In order for RTG to fully investigate the data and tools released by the Commission and collect sufficient evidence to demonstrate their inaccuracy and unreliability, it will need additional time. The limited period afforded for review and comment subsequent to the release of this information simply does not allow for adequate investigation and analysis. Accordingly, RTG requests that the Bureaus grant an extension of 21 days (i.e., until March 16, 2012) to give RTG members and other rural stakeholders that wish to participate in Auction 901 sufficient opportunity to vet the data on which the Commission will rely to determine Mobility Fund Phase I support.

The incomplete record that would result from denial of the instant request would severely undermine the very purpose of this proceeding. Auction 901 is intended to immediately accelerate deployment of networks for mobile voice and broadband services in unserved areas. The development of auctionable areas that relies on inaccurate data will skew the results of the auction so that universal service support is not targeted to the specific areas intended by the Commission's rules. If the haste to implement Mobility Fund Phase I results in eligible areas not receiving Phase I support (or worse, ineligible areas receiving Phase I support), then the policy basis for Auction 901 will be undermined.

Accordingly, for the foregoing reasons, RTG respectfully requests the FCC to extend the deadline for filing comments in this proceeding by 21 days to allow for the development of a full and complete record.

Respectfully submitted,

Rural Telecommunications Group, Inc.

/s/ Caressa D. Bennet

By: _____

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