

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

In the Matter of)	
)	
Structure and Practices of the Video Relay Service Program)	CG Docket No. 10-51
)	
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech disabilities)	CG Docket No. 03-123
)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to 47 C.F.R. § 1.46, Telecommunications for the Deaf and Hard of Hearing, Inc., National Association of the Deaf, Association of Late-Deafened Adults, Inc., Deaf and Hard of Hearing Consumer Advocacy Network, and California Coalition of Agencies Serving Deaf and Hard of Hearing, Inc. (collectively, “Consumer Groups”), respectfully request that the Federal Communications Commission (“Commission”) extend the deadline for filing comments and reply comments in this proceeding.¹ Comments are due on March 2, 2012 and reply comments are currently due on March 19, 2012.² Consumer Groups request a two-week extension of the comment deadline until March 16, 2012 and an extension of the reply comment deadline until April 16, 2012.

Consumer Groups are non-profit organizations, with limited resources, that represent many of the advocacy groups and organizations concerned with issues impacting deaf and hard

¹ *Structure and Practices of the Video Relay Service Program; Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, CG Docket Nos. 10-51 and 03-123, Further Notice of Proposed Rulemaking, FCC 11-184 (rel. Dec 15, 2011).

² Comment Cycle Established for Comments and Reply Comments on Structure and Practices of the Video Relay Service Program, Public Notice CG Docket Nos. 10-51 and 03-123, DA 12-119 (rel. Feb. 1, 2012).

of hearing Americans. As such, Consumer Groups are the primary advocates for those consumers that hope to benefit from the rulemaking.

The scope of the issues raised in the above referenced proceedings provides good cause for granting the extension. The Commission's Further Notice of Proposed Rulemaking ("FNPRM") spans 109 pages and expressly seeks comment on more than 100 very complex questions. The process of reviewing and analyzing such an extensive FNPRM is extremely time-consuming, particularly for non-profit consumer advocacy groups with limited resources. Further, Consumer Groups have been occupied with preparing comments in two other FCC proceedings with February 2012 deadlines,³ and as a result, Consumer Groups' limited resources have been unable to devote the necessary time to reviewing, analyzing, and preparing comments to the FNPRM. Consumer Groups also note that many of the individuals potentially impacted by the proposed reforms to the video relay service program communicate primarily through American Sign Language, while the content of the FNPRM is in English. With the FNPRM itself not being available in their native language, additional time is necessary for many of these individuals to review the FNPRM, discuss within their community, and produce responses and comments to the FNPRM. Although the Commission does not routinely grant extensions,⁴ the Commission has granted extensions when necessary to give parties a meaningful opportunity to

³ See e.g., *Facilitating Deployment of Text-to-911 and Other next Generation 911 Applications; Framework for Next Generation 911 Deployment*, Notice of Proposed Rulemaking, PS Docket No. 11-153, PS Docket No. 10-255, FCC 11-134 (rel. Sep. 22, 2011) (comments due February 9, 2012); *Implementation of Section 716 and 717 of the Communications Act of 1934, as Enacted by the Twenty-First Century Communications and Video Accessibility Act of 2010, Amendments to the Commission's Rules Implementing Sections 255 and 251(a)(2) of the Communications Act of 1934, as Enacted by the Telecommunications Act of 1996, In the Matter of Accessible Mobile Phone Options for People who are Blind, Deaf-Blind, or Have Low Vision*, CG Dkt. No. 10-213 & 10-145, WT Dkt No. 96-198, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-151 (rel. Oct. 7, 2011) (comments due Feb. 13, 2012).

⁴ See, 47 C.F.R. § 1.46(a).

develop a complete record for the Commission's consideration.⁵ Extending the comment and reply comment dates, as requested herein, will provide sufficient time for Consumer Groups and other parties to fully and carefully analyze the issues presented in the FNPRM and to prepare meaningful comments.

In addition, the requested extension will not unduly delay resolution of the issues raised in this proceeding or cause prejudice or hardship to any party. There is no impending event that requires immediate Commission action and, while recognizing the Commission's desire to move forward, the goal of developing useful policy recommendations based on clear and thorough assessment of the issues in this proceeding will best be served by granting an extension of time. A brief extension of the comment and reply comment deadlines will enable the Commission to gather and consider a more complete record and, therefore, will serve the public interest.

Accordingly, for good cause having been shown, Consumer Groups urge the Commission to grant the foregoing request for an extension of the deadline for filing comments and reply comments to March 16, 2012 and April 16, 2012, respectively.

Respectfully submitted,

/s/ Danielle Burt

Claude L. Stout
Executive Director
Telecommunications for the
Deaf and Hard of Hearing, Inc.
8630 Fenton Street, Suite 604
Silver Spring, MD 20910

Tamar Finn
Danielle Burt
Bingham McCutchen LLP
2020 K Street, N.W.
Washington, DC 20006
(202) 373-6000

Counsel to Telecommunications for the
Deaf and Hard of Hearing, Inc.

⁵ See, e.g., Media Bureau Grants Extension of Time to File Comments and Reply Comments in Response to Broadcast Localism Notice of Proposed Rulemaking, Public Notice, MB Docket No. 04-233, DA 08-515 (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.”).

Howard A. Rosenblum
Chief Executive Officer
National Association of the Deaf
8630 Fenton Street, Suite 820
Silver Spring, MD 20910

Cynthia Amerman
President
Association of Late-Deafened Adults, Inc.
8038 MacIntosh Lane
Rockford, IL 61107

Sheri Ann Farinha
Vice Chairperson
California Coalition of Agencies Serving
Deaf and Hard of Hearing, Inc.
4708 Roseville Rd, Ste 111
North Highlands, CA 95660

Cheryl Heppner
Vice Chair
Deaf and Hard of Hearing Consumer
Advocacy Network
3951 Pender Drive, Suite 130
Fairfax, VA 22010

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