

February 24, 2012

RE: Request for Extension of Deadline for FCC Form 477

To whom it may concern:

The Cedar Falls Municipal Communications Utility respectfully requests a 7-day extension until March 8, 2012, to complete and file Form 477 using 2010 Census Tract data.

Updating our subscriber database to reflect 2010 Census Tract data requires a substantial increase in administrative burdens to collect and organize the new data, and to import it into our billing system so that we may generate the necessary reports to file Form 477. Significant additional time is needed to obtain the updated information and input it into our systems so that the data can be re-extracted and reported in an appropriate, usable, and accurate format.

Cedar Falls Utilities appreciates the importance of the information being requested by the FCC, however, the administrative resources necessary to collect and organize this data present a significant hardship to our organization at this time. Members of our IT staff whose expertise would be necessary to write the code for updating this information, and then subsequently extracting the subscriber data, are currently working on a complete billing system migration. The format and manner of import of all data coming into our existing billing system must be analyzed to make sure it will convert in a usable fashion to the new billing system. This is especially important in this case to ensure the accuracy and integrity of future Form 477 filings, as well as the current submission. An extension until March 8th would allow us to gather and update the 2010 Census Tract data for our subscribers, and organize it in an accurate, reportable manner. It would also give us enough time to verify that the data will migrate appropriately into our new customer database for continued tracking of Census Tract information so that future reporting can take place without delays.

Accordingly, for the reasons described above, The Cedar Falls Municipal Communications Utility requests that the FCC grant it a 7-day extension for the Form 477 filing, currently due March 1, 2012. If the Form 477 is successfully completed prior to the expiration of this extension, it will be submitted at that time.

Respectfully submitted,

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