

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges ("Cramming"))	CG Docket No. 11-116
)	
Consumer Information and Disclosure)	CG Docket No. 09-158
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS**

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June 26, 2012

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the National Association of State Utility Consumer Advocates (NASUCA) requests that the deadline for submission of reply comments set forth in Public Notice DA 12-833, dated May 25, 2012, be extended for all commenters by thirty days, or until August 9, 2012.

The public notice addresses the need for solutions to the placement of unauthorized charges on consumer telephone bills, an unlawful practice commonly referred to as "cramming." Comments are requested on numerous issues. Much of the information requested is detailed information concerning the structure and mechanics of various proposals, including but not limited to the possible adoption of a requirement for consumer consent or affirmative "opt-in" to receive third-party charges.

Initial comments were due no later than June 25, 2012. As of noon today, over 300 pages of comments were filed in thirty-eight (38) filings. The public notice allows fourteen days from and after June 25, 2012, or until July 9, 2012, for review of initial comments and preparation of reply comments. The fourteen-day reply period includes the Fourth of July holiday. It includes NASUCA's midyear meeting, being held June 25-26, 2012.

Additional time is needed to review and study the initial comments and potentially to formulate thoughtful reply comments. In a membership organization, there is also a need to circulate proposed comments among the membership and to secure consensus and approval regarding them. This process can meaningfully take place only if adequate time is allowed for it.

The problem of cramming has persisted for more than a decade. The modest extension here requested will cause no undue delay in the search for a solution. It will

enable a well considered evaluation of the issues, first by the commenting parties and in due course by the Commission. It will serve the public interest.

NASUCA respectfully requests that the time for submission of reply comments be extended for all commenters until August 9, 2012.

Respectfully submitted,

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