

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 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)	CG Docket No. 98-170
)	

**COMMENT IN SUPPORT OF
NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER ADVOCATES'
MOTION FOR EXTENSION OF TIME**

Consumers Union submits these comments in support of the Motion for Extension of Time that was filed by the National Association of State Utility Consumer Advocates (NASUCA) on June 26, 2012. In its Motion, NASUCA requested the Federal Communications Commission (FCC) to extend the deadline to file reply comments for the Final Notice of Proposed Rule Making in the Cramming docket by thirty (30) days, or to August 9, 2012.

As NASUCA mentioned in its Motion, the original fourteen day period for filing reply comments is not a sufficient amount of time to go over the over 300 comments that have been filed in the above proceeding. The Fourth of July holiday is in the middle of the reply comment period. Furthermore, I am Consumers Union only telecommunications policy counsel, and I was unable to begin reviewing the comments that were filed until June 28, 2012, after I returned from a vacation.

As NASUCA noted, in order to thoroughly review the comments that have been filed and to provide the most thoughtful reply comments possible that take into consideration those comments, an extension will serve the public interest. An extension would also not cause undue delay in the regulatory process.

For the reasons discussed above and in NASUCA's Motion for Extension of Time, the Commission should extend the deadline for filing reply comments on the FNPRM of cramming for 30 days, or until August 9, 2012.

Sincerely,

A handwritten signature in black ink, appearing to read "Parul P. Desai". The signature is written in a cursive, flowing style.

Parul P. Desai
Policy Counsel
Consumers Union
1101 17th Street, NW
Suite 500
Washington, DC 20036
202.462.6262

June 28, 2012