

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

In the Matter of	)	
	)	
Universal Service Contribution Methodology	)	CG Docket No. 06-122
	)	
A National Broadband Plan For Our Future	)	GN Docket No. 09-51
	)	
	)	
	)	
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**MOTION FOR EXTENSION OF TIME  
TO FILE REPLY COMMENTS**

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July 11, 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 12-905, dated June 7, 2012, be extended for all commenters by thirty days, or until September 6, 2012.

The Further Notice of Proposed Rulemaking asks for comments on ways to pay for USF more fairly and efficiently. The FCC noted that the current contribution system has given rise to uncertainty, inefficiency, and market distortions. Outdated rules and loopholes mean that services that compete directly against each other may face different treatment. Universal service charges billed to consumers and businesses vary by company despite virtually identical service offerings, creating confusion and distorting markets. And compliance costs have increased as companies struggle to apply old rules to new products. The FCC seeks comments on reforms of the USF contribution system that will seek to promote efficiency, fairness and sustainability.

Initial comments were due July 9, 2012. As of noon today, over 1,465 pages of comments were filed in seventy-nine (79) filings. The public notice allows twenty-eight days from and after July 9, 2012, or until August 6, 2012, for review of initial comments and preparation of reply comments. The twenty-eight day reply period is inadequate to review the voluminous filings and coordinate among NASUCA members to fully address the complex issues raised by the initial comments.

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 appropriate contribution mechanism for Universal Service is of paramount importance to consumers. 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 September 6, 2012.

Respectfully submitted,

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