



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 13-780, dated April 18, 2013, be extended for all commenters by thirty days, or until June 28, 2013.

The public notice addresses the need for solutions to the serious and widespread problem that calls are not completing to rural destinations. Despite considerable study, the issues continue to be vexing ones. Comments are requested on numerous issues. Much of the information requested is detailed information concerning the workings of and increasingly complex and diverse telecommunications network.

Initial comments were due no later than May 13, 2013. Thirty-three sets of comments, totaling more than 600 pages, have been posted to the Commission's website. The public notice allows fifteen days from and after May 13, 2013, or until May 28, 2013, for review of initial comments and preparation of reply comments. The fifteen-day reply period includes the Memorial Day holiday.

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 rural call dropping has persisted for years. 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 June 28, 2013.

Respectfully submitted,

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