

**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**

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 13-1807, dated August 27, 2012, be extended for all commenters by thirty days, or until January 2, 2014.

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." Additional comments are requested on numerous detailed issues, including general comment on whether additional measures are needed to combat cramming, what those measures might be and the costs and benefits of any proposal.

Initial comments were due no later than November 18, 2013. Approximately 250 pages of comments were submitted by approximately 29 commenters.

The public notice allows fourteen days from and after November 18, 2013, or until December 2, 2013, for review of initial comments and preparation of reply

comments. The fourteen-day reply period includes the Thanksgiving Day holiday. It includes portions of NASUCA's annual meeting, held November 17-20, 2013.

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 the better part of two decades. 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 January 2, 2014.

Respectfully submitted,

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November 21, 2013