

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208
)	
ETC Annual Reports and Certifications)	WC Docket No. 14-58
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	

**MOTION BY COMPETITIVE CARRIERS ASSOCIATION FOR EXTENSION OF TIME
TO SUBMIT REPLY COMMENTS**

Competitive Carriers Association (“CCA”), pursuant to Section 1.46 of the Commission’s Rules, respectfully requests an extension of time by which to submit reply comments in response to the Commission’s *Further Notice of Proposed Rulemaking* in the above-captioned proceeding (“*FNPRM*”).¹ Specifically, CCA seeks a 30-day extension of the reply comment deadline, to October 8, 2014, based on the robust record developed through submission of initial comments in response to the *FNPRM*, as well as comments from a related proceeding.

CCA represents the interests of more than 100 competitive wireless carriers, including nationwide, regional and rural providers—many of which rely on high-cost universal service support. CCA filed comments in response to the *FNPRM* and intends to submit reply comments,

¹ Connect America Fund, *et al. Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking*, WC Docket No. 10-90 *et al.*, 29 FCC Rcd 7051 (2014) (“*FNPRM*”).

as do many of its members. The Commission's effort to make broadband available to all Americans is of vital importance to the U.S. economy and to the health, education and overall well-being of consumers.

Because of the critical importance of ubiquitous broadband and the role Universal Service plays in advancing that vital objective, the Commission should grant an extension of time for interested parties to file reply comments to ensure a robust record that informs the Commission with the most recent industry data. Looking at the record, over 130 companies, trade associations and industry groups filed substantive comments in response to the *FNPRM* totaling well over 1,000 pages. In addition to serving as a testament to the importance of this proceeding, this fulsome level of participation requires additional time to review and respond to the opening comments. The Commission has previously granted extension requests based on robust participation in the initial comment round.² And as CCA noted in its comments, it has commissioned an independent study of mobile broadband coverage in several rural states at county and sub-county levels.³ An extension of time would allow CCA time to review the research in conjunction with the comments submitted and incorporate the findings into its reply.

Moreover, the Commission recently adopted its *Tenth Broadband Progress Notice of Inquiry* ("*NOI*"), in which it seeks comment on how to address mobile and satellite services data in evaluating the timely deployment of advanced telecommunications capability.⁴ Comments on

² See, e.g., Wireless E911 Location Accuracy Requirements, *Order*, PS Docket No. 07-114, 29 FCC Rcd 5923 (PSHSB 2014) (granting an extension of time based on more than 40 sets of substantive comments being filed in response to the Commission's *Third Further Notice of Proposed Rulemaking*).

³ Comments of Competitive Carriers Association, WC Docket No. 10-90 *et al.* at 8, n.13 (filed Aug. 8, 2014).

⁴ Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such

the *NOI* are due on September 4th, and reply comments are due September 19th. The questions posed in the *NOI* are germane to issues raised in the *FNPRM* and the responses will likely provide additional, useful information about the need for Universal Service support. It would therefore serve the public interest if those parties intending to submit reply comments on the *FNPRM* were allowed time to review responses to the *NOI*. Moreover, the Commission has previously granted extension requests premised on the requesting party's ability to review pertinent information recently made available to the public.⁵

For the reasons set forth herein, CCA urges the Commission to expeditiously grant its request for a 30-day extension of the deadline by which to submit reply comments in the above-referenced proceeding.

Respectfully submitted,

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Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act, *Tenth Broadband Progress Notice of Inquiry*, GN Docket No. 14-146, FCC 14-113 (rel. Aug. 5, 2014).

⁵ See 2014 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, *et al.*, *Order*, MB Docket No. 14-50 *et al.*, DA 14-926 ¶ 5 (rel. June 27, 2014) (noting that the extended deadlines “w[ould] provide commenters a sufficient opportunity to fully develop their comments and reply comments in the 2014 Quadrennial Review *FNPRM* to include any facts, information or positions that are implicated by the content of the 2014 323 Report.”).