

**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 a Unified Intercarrier Compensation Regime)	CC Docket No. 01-92

**COMMENTS OF THE RURAL WIRELESS CARRIERS
ON MOTION FOR EXTENSION OF REPLY COMMENT DEADLINE**

**United States Cellular Corporation
NE Colorado Cellular, Inc., d/b/a Viaero Wireless
Smith Bagley, Inc.
DOCOMO PACIFIC, Inc.
Union Wireless Company
Cellular Network Partnership, an Oklahoma Limited Partnership
Nex-Tech Wireless, LLC
Texas 10, LLC, d/b/a Cellular One
Central Louisiana Cellular, LLC, d/b/a Cellular One
Carolina West Wireless, Inc.
Cellcom Companies
PR Wireless, Inc., d/b/a Open Mobile**

United States Cellular Corporation (“U.S. Cellular”), NE Colorado Cellular, Inc., d/b/a Viaero Wireless, Smith Bagley, Inc., DOCOMO PACIFIC, Inc., Union Wireless Company, Cellular Network Partnership, An Oklahoma Limited Partnership, Nex-Tech Wireless, LLC, Texas 10, LLC, d/b/a Cellular One, Central Louisiana Cellular, LLC, d/b/a Cellular One, Carolina

West Wireless, Inc., the Cellcom Companies,¹ and PR Wireless, Inc., d/b/a Open Mobile (collectively, “Rural Wireless Carriers” or “Rural Carriers”), by counsel and pursuant to Section 1.46 of the Commission’s Rules, support the request by the Competitive Carriers Association (“CCA”)² for a 30-day extension of the deadline to file reply comments in the above-captioned Further Notice of Proposed Rulemaking.³

The initial comment round produced a large number of comments covering a wide range of subject areas. Over 1,000 pages of comments were filed by telecommunications providers, ISPs, electric cooperatives, equipment manufacturers, trade associations, industry groups, public utility commissions, and other filers. Comments included detailed arguments and factual submissions covering topics that spanned the breadth of the subject areas submitted for comment in the *Further Notice*. These include complex policy matters relating to the deployment of voice

¹ Northeast Communications of Wisconsin, Inc., and its wireless carrier affiliates Brown County MSA Cellular Limited Partnership, Nsighttel Wireless, LLC, Wausau Cellular Telephone Company, LP, Wisconsin RSA No. 4, LP, and Wisconsin RSA No. 10, LP, are collectively referred to as the “Cellcom Companies”.

² See, <http://apps.fcc.gov/ecfs/document/view?id=7521805716>, filed August 22, 2014.

³ *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *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, Report and Order, Declaratory Ruling, Order, Memorandum Opinion and Order, Seventh Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 14-54 (rel. June 10, 2014), 79 Fed. Reg. 39164 (July 9, 2014) (“*Report and Order*” and “*Further Notice*”). The due date for comments in response to the *Further Notice* is August 8, 2014. The *Report and Order* and *Further Notice* continue implementation of universal service reforms adopted by the Commission in 2011. *Connect America Fund*, WC Docket No. 10-90, *A National Broadband Plan for Our Future*, GN Docket No. 09-51, *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135, *High-Cost Universal Service Support*, WC Docket No. 05-337, *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92, *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Lifeline and Link-Up*, WC Docket No. 03-109, *Universal Service Reform–Mobility Fund*, WT Docket No. 10-208, Report and Order and Further Notice of Proposed Rulemaking, 26 FCC Rcd 17663 (2011) (“*CAF Order*” and “*CAF Further Notice*”), *aff’d sub nom. In re FCC 11-161*, 703 F.3d 1015 (10th Cir. May 23, 2014).

and broadband service using a variety of technologies and in service territories that are subject to differing regulatory regimes.

An additional 30 days, until October 8, 2014, will be necessary to ensure that the extensive arguments and factual showings in the initial comments can be comprehensively addressed. With the complexity of the subject matter and the fulsome initial round of comments, the additional time will allow the Rural Wireless Carriers and other commenters to prepare a correspondingly robust set of reply comments so that the Commission can fully consider all relevant perspectives as it proceeds with its rulemaking process. We note that the Commission has previously extended reply comment deadlines based on the volume of comments and complexity of the subject matter.⁴

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⁴ See, e.g., *In the Matter of Wireless E911 Location Accuracy Requirements*, Order, 29 FCC Rcd 5923 (2014); *In the Matter of Promoting Technological Solutions to Combat Wireless Device Use in Correctional Facilities*, Order, 28 FCC Rcd 11,134 (2013).

For the reasons set forth above, the Rural Wireless Carriers support CCA's request for a 30-day extension of the deadline for reply comments in this proceeding, until October 8, 2014.

Respectfully submitted,

RURAL WIRELESS CARRIERS

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By:  _____

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