

Interested parties are currently reviewing the comments, but given the sheer number of comments, and the fact that many are voluminous and detailed, we request that the Commission provide a 30-day extension from the July 7, 2009 reply comment date. The scope of the proceeding, and the implications for consumers, industry, and the economy as a whole, is unprecedented. Additional time is necessary to ensure that the vast array of stakeholders that have participated thus far have a reasonable opportunity to evaluate proposals in the record and prepare thoughtful comments on reply.

Although the Commission does not routinely grant extensions of filing deadlines, it has often recognized that a pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses to the issues and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.³ Complicating matters further is the intervening July 4th holiday weekend, during which many stakeholders will no doubt be short-staffed in advance of the current July 7th reply comment deadline.⁴

³ See, e.g., *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) ("we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the *NPRM* and respond to the extensive comments filed in response thereto); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd. 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd. 26604, ¶ 2 (WCB 2003).

⁴ See, e.g., *Telephone Number Portability*, Order, 18 FCC Rcd. 26604, ¶ 5 (WCB 2003) (granting extension partially in recognition of intervening holiday); *Digital Broadcast Copy Protection*, Order, 17 FCC Rcd. 19740, ¶¶ 2-3 (MB 2002) (granting extension partially in recognition of intervening Thanksgiving holiday).

The undersigned organizations thus submit that a 30-day extension of the comment deadline through *August 6, 2009*, will enable stakeholders to more thoroughly evaluate the initial comments and, in turn, provide more substantive information in the reply comment cycle. Such an extension is particularly warranted in light of the Commission's desire for input from non-industry stakeholders, such as consumers, large and small businesses, federal, state, local, and tribal governments, non-profits, and disabilities communities, many of whom likely have limited resources to dedicate to the task of evaluating the record and drafting reply comments in such a short timeframe. No parties will be prejudiced by such an extension, and an August 6, 2009 reply date will provide the Commission ample time to prepare its Report to Congress.

For the foregoing reasons, we request a 30-day extension of the reply comment deadline, to August 6, 2009.

Respectfully submitted,

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June 22, 2009