

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

| | | |
|---|---|----------------------|
| In the Matter of |) | |
| |) | |
| Lifeline and Link Up Reform and Modernization |) | WC Docket No. 11-42 |
| |) | |
| Telecommunications Carriers Eligible for Universal Service Support |) | WC Docket No. 09-197 |
| |) | |
| Connect America Fund |) | WC Docket No. 10-90 |
| |) | |

**MOTION OF
THE NATIONAL ASSOCIATION OF STATE UTILITY CONSUMER
ADVOCATES
FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's Rules, the National Association of State Utility Consumer Advocates ("NASUCA")¹ respectfully requests that the Federal Communications Commission ("FCC") grant a brief extension of time to file comments in response to the *Second Further Notice of Proposed Rulemaking* ("FNPRM") in the above-captioned dockets. The FNPRM was published in the Federal Register on July 17,

¹ NASUCA is a voluntary association of 44 consumer advocate offices in 41 states and the District of Columbia, incorporated in Florida as a non-profit corporation. NASUCA's members are designated by laws of their respective jurisdictions to represent the interests of utility consumers before state and federal regulators and in the courts. Members operate independently from state utility commissions as advocates for utility ratepayers. Some NASUCA member offices are separately established advocate organizations while others are divisions of larger state agencies (e.g., the state Attorney General's office). NASUCA's associate and affiliate members also serve utility consumers but are not created by state law or do not have statewide authority. Some NASUCA member offices advocate in states whose respective state commissions do not have jurisdiction over certain telecommunications issues.

2015, with comments due August 17, 2015 and reply comments due September 17, 2015.

NASUCA seeks an additional 30 days for comments and reply comments, with due dates of September 16, 2015 and October 19, 2015, respectively. NASUCA makes this request because the issues addressed in the FNPRM are extremely complex and vitally important to the telecommunications customers NASUCA offices represent. The current deadlines do not give our organization sufficient time to provide adequate comment on the important questions posed in the FNPRM.

NASUCA represents the interests of Lifeline eligible customers and the telephone customers who support the Lifeline program through end user surcharges, including low income customers, in a large number of states. Our organization has been deeply involved in both Federal and state Lifeline issues for over three decades. We have been a staunch advocate of expanding the Lifeline program to include broadband, while recognizing that doing so would require tackling a myriad of very complex issues.

The proposals set forth in the FNPRM represent a sea change for the Lifeline program. There are literally hundreds of questions covering nearly every conceivable aspect of designing a Lifeline program for broadband, and many of the issues also affect the Lifeline program for voice services. While this was not unanticipated, it is nonetheless critical that the Commission receives comments that are thoroughly considered, taking the full complexity of the issues into account. NASUCA (and most likely other parties) needs additional time beyond 30 days to fully develop responses to the FNPRM.² The timing of the FNPRM is such that many key staff people, who would normally collaborate in drafting NASUCA's comments, are on pre-scheduled family

² NASUCA understands that similar motions to extend have been filed by the California Public Utilities Commission and jointly by USTelecom, CTIA, and ITTA.

vacations. Further, in a membership organization such as NASUCA there is also a need to circulate proposed comments among the membership and to secure consensus and approval. This is particularly true with respect to the sweeping changes being proposed to the Lifeline program.

NASUCA respectfully requests that the time for submission of comments be extended until September 16, 2015 and submission of reply comments until October 19, 2015 for all parties.

Respectfully submitted,

NASUCA
8380 Colesville Road, Suite 101
Silver Spring, MD 20910
Phone (301) 589-6313
Fax (301) 589-6380

David C. Bergmann,
Counsel
3293 Noreen Drive,
Columbus, OH 43221
Phone 614-771-5979
David.c.bergmann@gmail.com

August 3, 2015