Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act

GN Docket No. 14-126

USTELECOM'S REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT DEADLINES

The United States Telecom Association ("USTelecom") respectfully requests an extension of the comment and reply comment deadlines in the above-captioned proceeding, currently set for September 4, 2014 and September 19, 2014, respectively.1 Pursuant to Section 1.46 of the Commission’s rules, USTelecom requests that these deadlines be extended by 30 days such that comments are due no later than October 6, 2014 and reply comments are due no later than October 20, 2014.2 A short-term extension is in the public interest to allow interested parties an adequate opportunity to address in a meaningful manner the important questions raised in this proceeding regarding the deployment and availability of broadband.

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2 47 C.F.R. § 1.46.
USTelecom seeks an extension of time to gather appropriate information and submit useful information in response to the Notice of Inquiry. Some of the proposals upon which the Commission has requested comment are novel, such as: (i) setting broadband speed benchmarks based on the typical use of multiple devices simultaneously by a household comprised of multiple broadband users, id. ¶¶ 9-11; (ii) considering broadband adoption rates in establishing a broadband speed benchmark, id. ¶¶ 18-20; and (iii) establishing multiple broadband speed benchmarks, id. ¶¶ 22-23. In addition, some of these proposals involve complicated implementation issues, and determining whether these proposals can be implemented efficiently and effectively is necessarily a time-consuming inquiry.

Extending the deadline for comments and reply comments also will provide parties with the time necessary to submit thoughtful analyses regarding significant issues that could affect the Commission’s ultimate conclusions about the availability of broadband, such as the proper role of mobile and satellite services in the Commission’s analysis. Notice of Inquiry, ¶¶ 34-35. Further, the extension of time will help enhance the development of a more thorough record in this proceeding regarding the price, quality, and adoption of broadband and ensure that the Commission’s objective of making a reasoned determination about whether broadband is being “deployed to all Americans in a reasonable and timely fashion” is achieved. Id. ¶¶ 38-38.

USTelecom recognizes that requests to extend filing deadlines are not routinely granted, but the Commission has often found that a pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission’s
consideration. Under these circumstances, USTelecom believes that the proposed extension of time is appropriate so that the parties can respond adequately to the important issues raised in the Notice of Inquiry, which, in turn, will yield a more robust record for the Commission’s review.

For the foregoing reasons, the public interest is served by the requested 30-day extension of the comment and reply comment deadlines in the above-captioned proceeding to October 6, 2014 and October 20, 2014.

Respectfully submitted,

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