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August 31, 2006

Daniel P. Delaney

**Via Hand Delivery**

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James J. McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Bldg., 2nd Floor  
400 North Street  
Harrisburg, PA 17120

Re: In the Matter of FCC Intercarrier Compensation Proceedings at FCC in CC  
Docket No. 01-92: The Missoula Plan  
Docket No. M-00061972  
**Request for Extension of Schedule**

Dear Secretary McNulty:

On August 23, 2006, the Public Utility Commission ("Commission") entered an order at the above docket concerning the Missoula Intercarrier Compensation Plan ("Missoula Plan") filed by the NARUC ICC Task Force with the Federal Communications Commission ("FCC") at CC Docket No. 01-92. The Commission's order established a procedure for the solicitation of detailed input from interested members of the public on the Missoula Plan for the purpose of assisting the Commission in formulating and submitting detailed comments and reply comments with the FCC on the Plan. By Secretarial Letter dated August 23, 2006, the Commission scheduled a public workshop for Monday, September 11, 2006 and requested interested participants to submit their respective written presentations and/or materials to the Commission no later than the close of business on Tuesday, September 5, 2006. Because of a recent order of the FCC extending its own comment filing dates, AT&T Communications of Pennsylvania, LLC ("AT&T") requests the Commission to extend its workshop date and comment deadline to provide additional time to produce comments and testimony for the Commission's consideration.

On August 29, 2006, the FCC released an order extending the dates for filing comments on the Missoula Plan to October 25, 2006 for initial comments and December 11, 2006 for reply comments. A copy of the FCC order is included with this letter. As a result of the extension of the FCC filing dates, AT&T submits that the Commission can extend its own filing and workshop dates and still receive timely input from interested parties which will assist the Commission in formulating and submitting detailed comments and reply comments with the FCC on the Missoula Plan. Extending the current comment and



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workshop dates will allow interested parties an opportunity to file more complete comments which will assist the Commission in preparing its own FCC comments.

AT&T respectfully requests the Commission to provide a two-week extension for the filing of comments or written presentations to September 19, 2006. AT&T also requests that the Commission reschedule the workshop until the first week of October 2006. These revised dates will allow interested parties additional time to file their comments and presentations and provide the Commission with an adequate opportunity to review the presentations and timely file its own comments with the FCC by October 25, 2006.

Very truly yours,

A handwritten signature in black ink, appearing to read 'D. Delaney', written over a large, stylized circular flourish.

Daniel P. Delaney

PA Attorney I.D. 23955

Counsel for AT&T Communications of Pennsylvania, LLC

DPD/cem

cc: Wendell F. Holland, Chairman  
James H. Cawley, Vice Chairman  
Kim Pizzingrilli, Commissioner  
Bill Shane, Commissioner  
Terrance J. Fitzpatrick, Commissioner  
Karen Oill Moury, Executive Director  
Joseph K. Witmer, Esquire  
Hon. Kandace F. Melillo, ALJ

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

In the Matter of	)	
	)	
Developing a Unified Intercarrier Compensation Regime	)	CC Docket No. 01-92
	)	
	)	

**ORDER**

**Adopted: August 29, 2006**

**Released: August 29, 2006**

**Revised Filing Dates:**

**Comments Due: October 25, 2006**

**Reply Comments Due: December 11, 2006**

By the Associate Chief, Wireline Competition Bureau:

1. On July 24, 2006, the National Association of Regulatory Utility Commissioners' (NARUC's) Task Force on Intercarrier Competition filed an intercarrier compensation reform plan (the "Missoula Plan").<sup>1</sup> On July 25, 2006, the Wireline Competition Bureau (WCB) released a Public Notice requesting that comments on the Missoula Plan be filed by September 25, 2006, and reply comments by November 9, 2006.<sup>2</sup> On August 24, 2006, NARUC filed a motion requesting an extension of the comment date to October 25, 2006, and the reply comment date to December 9, 2006.<sup>3</sup> NARUC states that the extension would enable state commissions to conduct public workshops and more thoroughly analyze the complex proposal.<sup>4</sup> On August 25, 2006, CTIA-The Wireless Association (CTIA) filed an *ex parte* letter in support of the NARUC Motion.<sup>5</sup>

2. We agree that providing additional time to file comments and reply comments will facilitate the development of a more substantive and complete record in this proceeding. We note that it is the policy of the Commission that extensions of time shall not be routinely granted.<sup>6</sup> Given the

<sup>1</sup> Letter from Tony Clark, Commissioner and Chair, NARUC Committee on Telecommunications; Ray Baum, Commissioner and Chair, NARUC Task Force on Intercarrier Compensation; and Larry Landis, Commissioner and Vice-Chair, NARUC Task Force on Intercarrier Compensation, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 01-92 (filed July 24, 2006) (attaching the Missoula Plan). Although the Missoula Plan was filed by the NARUC Task Force on Intercarrier Compensation, members of the task force and NARUC have not taken positions on the Missoula Plan. *Id.* at 2.

<sup>2</sup> *Comment Sought on Missoula Intercarrier Compensation Reform Plan*, Public Notice, CC Docket No. 01-92, DA 06-1510 (WCB, July 25, 2006). See 71 Fed. Reg. 45510.

<sup>3</sup> Motion of the National Association of Regulatory Utility Commissioners for Extension of Time, CC Docket No. 01-92 (filed Aug. 24, 2006) (NARUC Motion).

<sup>4</sup> NARUC Motion at 2-3.

<sup>5</sup> Letter from Paul Garnett, Counsel, CTIA, to Marlene H. Dortch, Secretary, Federal Communications Commission, CC Docket No. 01-92 (filed August 25, 2006).

<sup>6</sup> 47 C.F.R. § 1.46(a).

extensive nature of the Missoula Plan and the complexity of the proposals contained therein, however, we find that good cause exists to provide parties an extension of time, from September 25, 2006 to October 25, 2006 for filing comments, and from November 9, 2006 to December 11, 2006 for filing reply comments in this proceeding.<sup>7</sup> In particular, we appreciate the importance of the issues raised in the Missoula Plan to NARUC and its member state commissions, and we agree that the additional time we grant here will help ensure their “continued full participation.”<sup>8</sup>

3. ACCORDINGLY, IT IS ORDERED that, pursuant to sections 4(i), 4(j), and 5(c) of the Communications Act, 47 U.S.C. §§ 154(i), 154(j), 155(c), and sections 0.91, 0.291, and 1.46 of the Commission's rules, 47 C.F.R. §§ 0.91, 0.291, 1.46, the pleading cycle established in this matter shall be modified as follows:

Comments Due: October 25, 2006

Reply Comments Due: December 11, 2006

4. IT IS FURTHER ORDERED that the Motion of the National Association of Regulatory Utility Commissioners for Extension of Time is GRANTED, as set forth herein.

FEDERAL COMMUNICATIONS COMMISSION

Donald K. Stockdale  
Associate Chief, Wireline Competition Bureau

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<sup>7</sup> In its motion, NARUC requested an extension of the reply comment date until December 9, 2006. That date, however, falls on a Saturday, which is a holiday under the Commission's rules. 47 C.F.R. § 1.4(e)(1). We therefore extend the reply comment deadline to the next regularly scheduled Commission business day, Monday, December 11, 2006.

<sup>8</sup> NARUC Motion at 3.