

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

In the Matter of)	
)	
Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges ("Cramming"))	CG Docket No. 11-116
)	
Consumer Information and Disclosure)	CG Docket No. 09-158
)	
Truth-in-Billing and Billing Format)	CC Docket No. 98-170

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS**

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October 27, 2011

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the National Association of State Utility Consumer Advocates (NASUCA) hereby requests that the Commission extend the deadline for filing reply comments set forth in Public Notice (DA 11-1449), dated August 24, 2011, regarding various proposals designed to assist consumers in detecting and preventing the placement of unauthorized charges on their telephone bills, an unlawful practice commonly referred to as "cramming." NASUCA requests a thirty-day extension, until December 21, 2011, to file reply comments.

The Public Notice allows 28 days, or until November 21, 2011, for review of initial comments and preparation of reply comments. As of the time this motion was prepared, initial comments had been posted to the Commission's website from 277 parties. Although many of the initial comments are short and will not require a specific reply, a substantial number of the comments raise substantial issues of both law and fact which will require significant study and evaluation.

NASUCA needs additional time to review the initial comments, seek input from its members and formulate thoughtful reply comments. It will take time to circulate proposed reply comments among NASUCA members and secure consensus regarding them. The reply period includes NASUCA's annual meeting, to be held November 13-16, 2011, making it more difficult for NASUCA to complete reply comments within the time currently allowed. NASUCA, in its initial comments, has carefully addressed the issues. In order to reply to other parties in similar fashion, additional time will be needed.

Once implemented, any rules adopted by the Commission will potentially have a far-reaching impact on both consumers and the industry. Given the importance and complexity of the subject matter of this rule-making, and the longstanding nature of the problem it seeks to redress, the additional time requested will enable a more complete and careful analysis of the issues and will foster a more complete record, without causing undue delay in the process. The additional time will therefore serve the public interest.

For the foregoing reasons, NASUCA respectfully requests that the Commission grant this motion and grant the extension requested.

Respectfully submitted,

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