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

In the Matter of	)	
	)	
Comments Invited on Verizon's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition	)	WC Docket No. 26-252
	)	
	)	
	)	

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

Pursuant to 47 C.F.R. §1.46, The National Association of State Utility Consumer Advocates (NASUCA),The Utility Reform Network (TURN), the Pennsylvania Office of Consumer Advocate, the Connecticut Office of Consumer Counsel, the Consumer Advocate Division of the Public Service Commission of West Virginia, the People's Counsel for the District of Columbia, the Maryland Office of People's Counsel, the Massachusetts Attorney General's Office, and the Public Utility Law Project of New York (collectively "Consumer Advocates") request an extension to file comments in the above captioned proceeding.[1] For the reasons set forth below, including protection of all affected parties' due process rights, Consumer Advocates respectfully request that the time to file comments be extended seven days, to December 11, 2026.

Consumer Advocates recognize that Commission policy provides that extensions of time are not routinely granted,[2] several unique factors mean that a short delay will provide the Commission a robust record, will not delay the proceeding, and will ensure that many individuals, advocates, and organizations that will be directly affected by the subject of the Public Notice have adequate notice and opportunity to be heard.

First, the timing of this matter in relation to the calendar means that the short comment window will essentially be divided into two halves as a major national holiday falls directly in the middle of the comment period. This could remove up to four days from the comment period because of planned holiday travel and leave. Reducing the comment period by almost one-third to ten days, further constraining individual and organizational ability to prepare detailed comments and severely impacts the Consumer Advocates and all affected parties' due process rights.

Additional time is also warranted because the record in this proceeding is likely to contain a significant amount of complex material. The time needed to analyze the claims found in Verizon's 214 application, and gathering supporting data and evidence will be a lengthy process. Absent additional time, commentors may be deprived of a meaningful opportunity to share both qualitative and quantitative information material to the Commission's decision-

[1] *See* Comments Invited on Verizon's Section 214 Application to Discontinue Domestic Legacy Voice Service as Part of a Technology Transition, WC Docket No. 26-252, Public Notice, DA 26-1249, (WCB 2026) (PN).
[2] *See* 47 C.F.R. § 1.46(a).

making process. The Commission must ensure that the due process rights of all affected parties are protected.

The complexity of issues presented here, the anticipated time needed to prepare detailed filings, and the compressed comment period, in light of the Thanksgiving holiday schedule, demonstrates that granting a modest extension of time through and including December 11, 2026, for comments will allow for a more complete and informed record, will not materially delay the proceeding, will help ensure all affected parties' due process rights, and will serve the public interest.

Respectfully Submitted,

/s/ *Ryan Johnston*
Ryan Johnston
Telecom. Regulatory Attorney
The Utility Reform Network
360 Grand Ave. #150
Oakland CA, 94610
Email: rjohnston@turn.org

David Springe
Executive Director
National Association of State Utility Consumer Advocates
8777-B Piney Orchard Pkwy. Suite 173
Odenton, MD 21113
Phone: (785) 550-7606
Email: david.springe@nasuca.org

Dated: November 24, 2026