

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

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
A National Broadband Plan for Our Future)	GN Docket No. 09-51
)	
Establishing Just and Reasonable Rates for Local Exchange Carriers)	WC Docket No. 07-135
)	
High-Cost Universal Service Support)	WC Docket No. 05-337
)	
Developing an Unified Intercarrier Compensation Regime)	CC Docket No. 01-92
)	
Federal-State Joint Board on Universal Service)	CC Docket No. 96-45
)	
Lifeline and Line-Up)	WC Docket No. 03-109
)	
Universal Service Reform – Mobility Fund)	WT Docket No. 10-208

**JOINT MOTION FOR
WAIVER OF PAGE LIMIT**

The National Exchange Carrier Association (“NECA”), the National Telecommunications Cooperative Association (“NTCA”), the Organization for the Promotion and Advancement of Small Telecommunications Companies (“OPASTCO”), and the Western Telecommunications Alliance (“WTA”) (collectively, the “Rural Representatives”) hereby request that the Commission waive the page limitation set forth in Section 1.429 of the

Commission's rules, that applies to Petitions for Reconsideration, Oppositions to Petitions for Reconsideration, and Replies to Oppositions as pertaining to the above referenced matter.¹

The Commission's Order in this matter, not including ordering clauses, appendices, or rules is more than 380 pages long and addresses a myriad of complex and challenging issues. A 25-page limitation does not allow for a full and complete discussion of the issues. Many of issues are interrelated and the Rural Representatives intend to address them in a single, consolidated petition for reconsideration. Such a single filing would eliminate the need for duplicative pleadings, thereby reducing the burden on all parties to the proceeding and conserve Commission resources.

Although the Commission does not routinely grant waivers of the page limitations, it will do so for good cause shown and when the public interest would be so served.² The Rural Representatives respectfully submit that the public interest would be best served if the Commission increases the 25-page limit for petitions for reconsideration as well as oppositions

¹ 47 C.F.R. § 1.429 (d), (f) and (g).

² See, e.g., In the Matter of Advanced Television Systems and their Impact Upon the Existing Television Broadcast Service, MM Docket No. 87-268, 12 FCC Rcd 7698, *Order Permitting the Filing of Combined Petitions*(June 5, 1997), In the Matter of Amendment of Parts 1,21,73,74 and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, Educational and Other Advanced Services in the 2150-2162 and 2500-2690 Bands, WT Docket No. 03-66, Part 1 of the Commission's Rules – Further Competitive Bidding Procedures, WT Docket No. 03-67, Amendment of Parts 221 and 74 to Enable Multipoint Distribution Service and the Instructional Television Fixed Service Amendment of Parts 21 and 74 to Engage in Fixed Two-Way Transmissions; MM Docket No. 97-217, Amendment of Parts 21 and 74 of the Commission's Rules with Regard to Licensing in the Multipoint Distribution Service and in the Instructional Television Fixed Service for the Gulf of Mexico, WT Docket No 02-68, *Order*, 20 FCC Rcd 1606 (January 25, 2005), In the Matter of 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 02-277, *Order*, FCC Rcd 16554 (August 15, 2003).

in this proceeding to 50 pages and the limitation normally governing replies to oppositions to petitions for reconsideration to 20 pages in this instance.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I, Adrienne L. Rolls, certify that a copy of the foregoing Joint Motion For Waiver of Page Limit of the National Exchange Carrier Association, the National Telecommunications Cooperative Association, the Organization for the Promotion and Advancement of Small Telecommunications Companies, and the Western Telecommunications Alliance (collectively, the “Rural Representatives”) in WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, FCC 11-161, was served on this 20th day of December 2011 via electronic mail to the following persons:

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