

of an increasingly complex and diverse telecommunications network.”² NASUCA states that additional time is needed to formulate thoughtful responses to these comments, as well as time to circulate drafts among NASUCA’s membership. NASUCA further points out that the current fifteen-day period for Replies includes the Memorial Day holiday.³

The Rural Associations agree completely with NASUCA that the “problem of rural call dropping has persisted for years” and that associated issues should be evaluated carefully. But while NASUCA asserts an additional 30 days’ time for Replies will not cause undue delay in the search for a solution, the fact is that solutions to the rural call completion problem have already been delayed too long. The Commission should not add additional delay at this point via an extension of time.

The Rural Associations understand completely the difficulties of addressing complex issues raised in comments and in reaching consensus among constituent members as to reasonable responses. In fact, the Rural Associations share the exact same burdens. But the correct response to a problem that “has persisted for years” is not to add delay but to move forward as quickly as possible with potential resolutions. As will be made plain in the Rural Associations’ Reply comments, many of the technical issues raised in comments are in fact red herrings, designed simply to delay implementation of the Commission’s plans to collect necessary data, and therefore do not warrant extensive consideration.

For these reasons, the Rural Associations oppose grant of an extension of time for Reply comments in this proceeding. If the Commission nevertheless does decide to grant NASUCA’s request, the Commission should redouble its efforts to consider the record in

² *Id.* at 2.

³ *Id.*

this proceeding in a speedy way, and to adopt final rules governing collection of data as proposed in the Notice of Proposed Rulemaking, so as to assure resolution of rural call completion problems as quickly as possible.

Respectfully submitted,

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May 20, 2013

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Associations' Opposition was served this 20th day of May, 2013 by electronic filing and e-mail to the persons listed below.

By: /s/ Elizabeth R. Newson
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The following parties were served:

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