

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON D.C. 20554**

In the Matter of:)	
)	WC Docket No. 18-141
Petition of US Telecom for Forbearance)	
Pursuant to 47 U.S.C. § 160(c) to Accelerate)	
Investment in Broadband and)	
Next-Generation Networks.)	
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**MOTION OF THE
MICHIGAN PUBLIC SERVICE COMMISSION
FOR EXTENSION OF TIME**

Pursuant to 47 C.F.R. § 1.46, the Michigan Public Service Commission (MPSC) files this motion requesting an extension of time to file comments in the above captioned proceeding. Pursuant to the Commission’s May 8, 2018 Public Notice, comments are due on June 7, 2018, with reply comments due on June 22, 2018. The MPSC respectfully requests a minimum extension of 60 days for comments, through and including August 6, 2018 with reply comments due 30 days later on September 5, 2018.

The MPSC is aware that forbearance petitions typically “allow 30 days for comments and 15 days for replies” and that extensions are not routinely granted, however the Commission’s *Forbearance Procedures Order* also anticipated “longer cycles for the more complex petitions.”¹ US Telecom’s forbearance petition certainly

¹ *Petition to Establish Procedural Requirements to Govern Proceedings for Forbearance Under Section 10 of the Communications Act of 1934, as Amended, Report and Order, FCC 09-56, 24 FCC Rcd. 9543, ¶ 29 (2009) (“Forbearance Procedures Order”)*

meets this standard due to the multiple complex, factual and legal issues raised in the petition. As the MPSC is the state commission in Michigan that exercises the authority delegated to states under Sections 251 and 252 of the 1996 Act, the MPSC will be directly affected, along with the telecommunications providers under the MPSC's jurisdiction, by any forbearance granted by the Commission in response to US Telecom's petition.

As raised by the other state commissions requesting extensions, many state commissions, including the MPSC, have procedures that must be followed before comments on a proceeding such as this can be submitted. This lengthens the time required by a state commission to prepare and file comments and the current comment cycle is simply not adequate to give the petition the thorough review and analysis it demands to prepare meaningful comments for the Commission's consideration.

The MPSC notes that several other states, industry associations, NARUC, and NASUCA have all filed similar motions for extension or letters in support of these motions. In addition, US Telecom has stated in an *Ex Parte* filing dated May 21, 2018 that it "will not oppose any of the Motions for Extension of Time to file comments and replies filed in this docket."² Because of the importance of the issues raised in the petition and the potential wide reaching affects, and with the motions unopposed, the MPSC respectfully asks the Commission to grant the requested

² US Telecom *Ex Parte* filing dated May 21, 2018. WC Docket 18-141.

extension. Doing so would not unreasonably extend the proceeding and would allow all interested parties the opportunity to provide complete and meaningful comments to the Commission.

Respectfully submitted,

MICHIGAN PUBLIC SERVICE COMMISSION

Steven D. Hughey (P32203)
Assistant Attorney General
Public Service Division
7109 W. Saginaw Hwy., 3rd Floor
Lansing, MI 48917
Telephone: (517) 284-8140

DATED: May 24, 2018
18-141/Mot for Exten to file Comments