

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
)  
Implementation of Sections 255 and )  
251(a)(2) of the Communications Act of )  
of 1934, as Enacted by the )  
Telecommunications Act of 1996; )  
)  
Access to Telecommunications Service, )  
Telecommunications Equipment and )  
Customer Premises Equipment by )  
Persons with Disabilities )

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

WT Docket No. 96-198

**MOTION FOR EXTENSION OF TIME**

The Voice on the Net Coalition ("VON Coalition"), pursuant to Section 1.46 of the Commission's rules, hereby requests an extension of the comment and reply comment deadlines applicable to the Notice of Inquiry ("NOI") released September 29, 1999 in the above-captioned proceeding.<sup>1/</sup> This request is supported by the National Association of the Deaf ("NAD"), Self Help for Hard of Hearing ("SHHH") and the American Foundation for the Blind ("AFB"), each of which participated in WT Docket No. 96-198.

The current comment and reply comment deadlines are November 14, 1999 and December 14, 1999, respectively. For the reasons explained herein, the VON Coalition requests

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<sup>1/</sup> The VON Coalition is a trade association whose member companies are involved in the development of voice services using data networks, including the Internet. Member companies include service providers such as DeltaThree, IDT, ITXC, and USA Global Link, and their suppliers, including Cisco, Intel, Microsoft, Netspeak, and Vocaltec. Additional information regarding the VON Coalition is available on its website, <<<http://www.von.org>>>

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an extension of 60 days for each deadline, or until January 13, 2000 and February 14, 2000, respectively.

The requested extension will provide the parties with additional time in which to meet and discuss their concerns. These discussions should more clearly frame the issues and establish the basis for a continuing dialogue between the VON Coalition and advocates for the disability community regarding accessibility.

In addition, the requested extension alleviates potential concerns regarding the sufficiency of notice. Such concerns are attributable to a delay in *Federal Register* publication of the NOI. Though released on September 29, 1999, as of the date of this filing the NOI had not appeared in the *Federal Register*. Extending the comment and reply deadlines ensures that no party is disadvantaged due to the delay in formal notice.

While a 30-day extension of each deadline offers the parties the opportunity to meet and should alleviate concerns regarding notice, for some parties it may result in a shortened period in which to prepare reply comments, to the detriment of both such parties and the record. Specifically, a 30-day extension would move the reply deadline to January 14, 2000, thereby requiring that parties prepare their reply comments, in part, during the year-end holidays. Some of the organizations involved are closed or operate with reduced staff at the end of December. A 60-day extension both avoids this issue and offers the parties greater flexibility in scheduling calls and meetings.

For the reasons stated herein, the VON Coalition respectfully requests that the Commission grant this motion for an extension of time.

Respectfully submitted,

**THE VON COALITION**



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