



Sandra Mattavous-Frye, Esq.  
People's Counsel

October 16, 2018

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission of the  
District of Columbia  
1325 G Street, N.W., Suite 800  
Washington, DC 20005

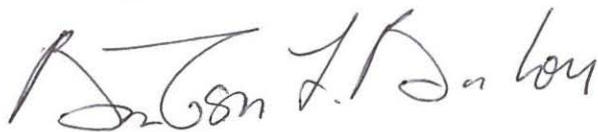
**Re: RM27-2016-02, In the Matter of the Commission's Investigation into the  
Rules Governing Local Exchange Carrier Quality of Service Standards for  
the District**

Dear Ms. Westbrook-Sedgwick:

Please find enclosed for filing an original and three (3) copies of the *Office of the People's Counsel for the District of Columbia's Motion for Enlargement of Time to Submit Initial and Reply Comments Pursuant to the Notice of Second Proposed Rulemaking* in the above-referenced proceeding.

If there are any questions regarding this matter, please contact me at (202) 727-3071.

Sincerely,



Barbara L. Burton  
Assistant People's Counsel

Cc: All parties of record

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

In the Matter of	)	
	)	
The Commission's Investigation	)	
into the Rules Governing	)	RM27-2016-02
Local Exchange Carrier	)	
Quality of Service Standards	)	
for the District	)	

**OFFICE OF THE PEOPLE'S COUNSEL FOR THE  
DISTRICT OF COLUMBIA'S MOTION FOR ENLARGEMENT OF TIME TO SUBMIT  
INITIAL AND REPLY COMMENTS PURSUANT TO THE NOTICE OF SECOND  
PROPOSED RULEMAKING**

**I.     INTRODUCTION**

Pursuant to Rules 105.8 and 117.5 of the Public Service Commission of the District of Columbia's ("PSC" or "Commission") Rules of Practice and Procedure,<sup>1</sup> the Office of the People's Counsel for the District of Columbia ("Office" or "OPC"), the statutory representative of District of Columbia utility ratepayers and consumers,<sup>2</sup> hereby respectfully submits the *Office of the People's Counsel for the District of Columbia's Motion for Enlargement of Time to Submit Initial and Reply Comments Pursuant to the Notice of Second Proposed Rulemaking* ("*Motion for Enlargement*"). OPC respectfully requests the Commission (i) grant this *Motion for Enlargement* and (ii) extend the comment-submission deadlines set forth in the Notice of Second

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<sup>1</sup> 15 DCMR §§ 105.8 and 117.5 (Lexis 2018).

<sup>2</sup> D. C. Code § 34-804 (Lexis 2018).

Proposed Rulemaking<sup>3</sup> to December 12, 2018 for initial comments and January 14, 2019 for reply comments.

## **II. BACKGROUND/PROCEDURAL HISTORY**

On October 5, 2018, the Commission issued a Notice of Second Proposed Rulemaking.<sup>4</sup> The proposed amendments would update sections in Chapter 27 of Title 15 of the District of Columbia Municipal Regulations to (i) require all telecommunications service providers, as opposed to competitive local exchange carriers only, and regulated local exchange services to comply with certain requirements when they withdraw certification and (ii) establish notice requirements for telecommunications service providers that are abandoning copper facilities in the District.<sup>5</sup>

Initial and reply comments are due November 5, 2018 and November 19, 2018, respectively.<sup>6</sup>

## **III. DISCUSSION**

The Second Notice addresses issues that require OPC to obtain technical consulting services which, pursuant to D.C. law, can only occur through a procurement process specified therein. OPC has taken the first step to obtain Commission approval for a technical consultant by preparing a Notice of Agency Fund Requirements (“NOAFR”) that will be submitted to the affected utility, Verizon Washington, DC Inc., no later than October 16. Typically, it takes 30

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<sup>3</sup> *RM27-2016-02, In the Matter of the Commission’s Investigation into the Rules Governing Local Exchange Carrier Quality of Service Standards for the District, (“RM27-2016-02”),* Notice of Second Proposed Rulemaking, 65 D.C. Reg. No. 41 (October 5, 2018) (“Second Notice”).

<sup>4</sup> *RM27-2016-02, Second Notice* at p. 011031.

<sup>5</sup> *RM27-2016-02, Second Notice* at p. 011031.

<sup>6</sup> The 30<sup>th</sup> day is November 4, however, Commission Rule 117.1 provides that when filing deadlines fall on a Saturday, Sunday or legal holiday, the filing deadline shall extend to and include the next succeeding day that is a business day.

days from the date the affected utility receives OPC's NOAFR for the Commission to issue an order approving or disapproving OPC's request. Until that time, and until a contract is executed, by law, the Office is prohibited from using consultants for this matter. By the time OPC receives such approval, the Office estimates it will be November 12, 2018—or a week after the current filing deadline for initial comments and a week before the current due date for reply comments. OPC will need more than 15 calendar days to prepare comments for submission. For this reason, the Office requests an enlargement of time until December 12, 2018 to file initial comments and January 14, 2019 to file reply comments.

OPC contacted Verizon Washington, DC Inc. ("Verizon"), the Communications Workers of America ("CWA") and the Fiber Broadband Association (successor organization to Fiber to the Home Council Americas). These parties previously submitted comments during the first rulemaking in this proceeding. Verizon does not object to OPC's request so long as the date for reply comments will be extended to January 14, 2019. CWA does not oppose OPC's request, and OPC did not hear from the Fiber Broadband Association's representative by the time it was necessary to file this *Motion*. Lastly, no party will be prejudiced by enlarging the initial and reply comment submission dates to December 12, 2018 and January 4, 2019, respectively.

#### IV. CONCLUSION

WHEREFORE, for the reasons stated herein, the Office respectfully requests the Commission (i) grant this *Motion for Enlargement of Time* and (ii) extend the initial and reply comment deadlines to December 12, 2018 and January 14, 2018, respectively.

Respectfully submitted,

A handwritten signature in black ink, reading "Sandra Mattavous-Frye" followed by a stylized flourish or set of initials.

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Dated: October 16, 2018

## CERTIFICATE OF SERVICE

### **RM27-2016-02, In the Matter of the Commission's Investigation into the Rules Governing Local Exchange Carrier Quality of Service Standards for the District**

I hereby certify that on April 30, 2018, a copy of the *Reply Comments of the Office of the People's Counsel for the District of Columbia* was served on the following parties of record by hand delivery, first class mail, postage prepaid, or electronic mail:

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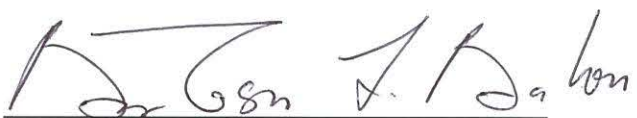
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