

REQUEST FOR EXTENSION OF REPLY COMMENT DEADLINE

By

THE ULTRA WIDE BAND (UWB) ALLIANCE

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

**Expanding Flexible Use in Mid-Band
Spectrum Between 3.7 and 24 GHz**

Unlicensed Use of the 6 GHz Band

ET Docket No. 18-295

GN Docket No. 17-183

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the Ultra Wide Band (UWB) Alliance respectfully request a 14-day extension of time, until April 1, 2019, to submit reply comments in the above-captioned proceeding.¹ Grant of the extension request will permit the development of a more complete record in this proceeding, which will allow the Commission to have a better basis on which to consider how to proceed with proposing rules that will make critical mid-band spectrum available for terrestrial wireless use.

In the *NPRM*, the Commission seeks input on its proposed rule opening the mid-band spectrum to fixed and mobile wireless broadband operations, specifically in the 5.925-7.125 GHz band. This band hosts different incumbent operations and may be subject to different rules in the future, depending on how the Commission chooses to allocate them to new licensed and unlicensed uses.

Due to the critical need for the spectrum in the 6 GHz band – by First Responders, local utility commissions, incumbent low-power applications such as those of the UWB Alliance members companies, and the RLANs seeking to enter into it – there are a myriad of perspectives to be evaluated. In fact, many parties submitted comments in response to the *NPRM*: one hundred and fifteen in total, across a range of industries. Many commenters provided extensive and detailed technical and

¹ *In the Matter of Expanding Flexible Use in the Mid-Band Spectrum Between 3.7 and 24 GHz*, GN Docket No. 17-183 (rel. Aug. 3, 2017); and *Unlicensed Use of the 6 GHz Band*, ET Docket No. 18-295 (rel. Dec. 17, 2018) (*the "NPRM"*).

engineering information as part of their comments. The UWB Alliance, in seeking an extension of time to submit reply comments recognize that the Commission does not routinely grant such request and the fact that there is a large number of initial comments should not automatically result in an extension of time. In fact, many respondents have noted the need for expeditious action from the Commission to free up spectrum due to the high demand.

Despite this, there are several reasons that support the Commission granting a modest 14-day extension in this proceeding. *First*, as noted above, the record includes often lengthy and technical analyses of the current use of the 6 GHz band. In order to develop a complete record, the public interest supports allowing parties a meaningful opportunity to review and respond to those analyses. The current thirty-day reply comment period simply does not permit that type of consideration, particularly by membership-based organizations such as the UWB Alliance, where coordination among members is both required and productive.

Second, the further development of the record will *hasten*, not hinder, the Commission's decision-making in this proceeding and related proceedings. By allowing interested parties additional time to fully address issues such as interference mitigation, incumbent protections, relocation and other issues raised and extensively discussed in comments, the Commission will be in a substantially more informed position to decide how to best proceed. And, by proposing processes and rules that have been developed through a more complete record, the Commission will be in a better position to consider adopting rules that will meet the Commission's goal of making efficient use of the 6 GHz band.

Accordingly, the UWB Alliance urge the Commission to extend the deadline for the submission of reply comments in this proceeding, for a brief 14-day period, until April 1, 2019.

Respectfully submitted,

Timothy Harrington
Executive Director
Ultra Wide Band Alliance

February 25, 2019