

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

_____))
In the Matter of)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9

))
In the Matter of)
Amendment of Parts 2, 21, and)
94 of the Commission's Rules)
to Accommodate Private)
Microwave Systems in the)
1.71-1.85 GHz Band and in)
Bands Above 3 GHz)
_____)

RM-7981

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MAY 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

OPPOSITION TO REQUEST TO DEFER COMMENT DATES

Personal Communications Network Services of New York, Inc., a LOCATE company, ("PCNS-NY") by its undersigned counsel, hereby opposes the request of Alcatel Network Systems, Inc. to defer the deadline for filing comments in the Commission's emerging technologies docket, ET Docket No. 92-9. The Commission has already deferred the comment period in the emerging technologies docket once at the request of the American Petroleum Institute (API), the Utilities Telecommunications Council (UTC), the Association of American Railroads (AAR), and the Larger Public Power Council (LPPC).^{2/} A second deferment is unwarranted and

^{2/}Order Extending Time for Comments and Reply Comments, In the Matter of Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, ET Docket No. 92-9 (Rel. April 1, 1992).

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will further delay the introduction of emerging technologies such as PCS to the American people.

The Commission's Notice of Proposed Rulemaking was adopted on January 16, 1992. As the comment deadline approaches, entities opposed to the Commission's proposal have begun to file a raft of new requests for rulemakings. The choice by these petitioners to file separate petitions rather than address the issues they have raised in context of the Notice of Proposed Rulemaking has complicated these proceedings.

The Commission should not stray from its course. Without swift and definitive action by the Commission to keep this proceeding on track, the emerging technologies docket will soon begin to mirror the Commission's cellular proceedings. At the en banc hearing it was estimated that the cost of delay in the cellular proceeding to the United States economy was \$86 Billion.**/ Neither the U.S. economy nor the American people can afford such a delay in the introduction of emerging technologies such as personal communications services.

**/See Written Statement of Dr. Charles L. Jackson, National Economic Research Associates Before the FCC en banc Hearing on Personal Communications Services, December 5, 1991, at 4-5.

Accordingly, Alcatel Network Systems, Inc.'s request to defer the comment deadline should be denied.

Respectfully submitted,



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Date: May 28, 1992

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of May 1992, copies of the Opposition to Request to Defer Comments were served by first class mail, postage prepaid, on the following:

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