

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

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MAY 29 1992

Federal Communications Commission
Office of the Secretary

In the Matter of)
)
Policies and Rules for)
Licensing Fallow 800 MHz)
Specialized Mobile Radio)
Spectrum Through a Competitive)
Bidding Process)

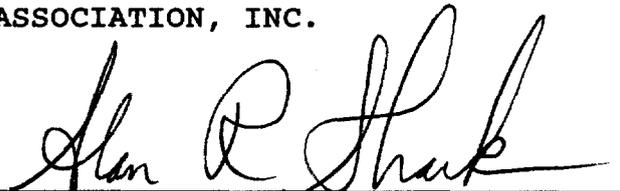
RM -

TO: The Commission

REQUEST FOR EXTENSION OF TIME TO
FILE COMMENTS ON PETITION FOR RULEMAKING

Respectfully submitted,

AMERICAN MOBILE TELECOMMUNICATIONS
ASSOCIATION, INC.

By: 

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May 29, 1992

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The American Mobile Telecommunications Association, ("AMTA" or "Association"), pursuant to Section 1.46(b) of the Commission's Rules and Regulations, respectfully requests that the Commission extend until Friday, July 17, 1992, the period in which it may file Reply Comments in the above entitled proceeding.^{1/} AMTA is a nationwide, non-profit trade association where voting membership represents the majority of operational SMR systems in the country. Due to the significance of the issues raised in the Fleet Call Petition, AMTA believes that the public interest will be well-served if the Commission grants the extension requested herein.

1. On April 22, 1992, Fleet Call submitted a Petition for Rulemaking ("Petition") requesting that the Commission auction blocks of vacant 800 MHz spectrum in various markets throughout the country. The Petition was placed on Public Notice on May 11, 1992^{2/}. Pursuant to that Notice, Comments on the Petition are due on June 10, 1992.

2. The issues raised in the Petition are matters of substantial importance to AMTA and its members, as they are to the Commission. AMTA shares Fleet Call's desire to provide for the efficient use of 800 MHz spectrum nationwide and to promote

^{1/} Fleet Call, Inc., Petition for Rulemaking, In the Matter of Policies and Rules for Licensing Fallow 800 MHz Specialized Mobile Radio Spectrum Through a Competitive Bidding Process, RM- (April 22, 1992).

^{2/} See, Public Notice Report No. 1889, May 11, 1992.

the introduction of advanced digital technology in the SMR industry. However, due to the complex nature of the issues involved and the potential impact upon the SMR industry, AMTA needs sufficient time to analyze fully and prepare its Comments in this matter.

3. The AMTA Board of Directors will address the issues raised in the Petition at its annual meeting on June 23-25, 1992. While the Association's Regulatory Committee has already convened and has begun to disseminate to the Board analyses regarding the areas in the Petition which must be considered, these matters must be resolved subsequent to full Board deliberation and debate. The Association will then need a reasonable amount of time to prepare and circulate to the Board Comments reflecting the decisions reached.

4. Accordingly, AMTA requests until July 17, 1992 to submit its Comments. Because of the complex nature of the issues raised in the Petition, the need for full Board consideration of the matters vital to the future of their industry, and the proximity in time to the comment dates in other Private Land Mobile proceedings, AMTA does not believe it could file constructive comments without this extension.^{3/} Fleet Call has indicated that it will not object to the instant extension request.

^{3/} Comments in PR Docket No. 92-79 regarding the elimination of SMR end-user licensing are due on June 11, 1992, while Comments in PR Docket No. 92-78 relating to end-user and mobile licensing information are due on June 26, 1992. In addition, NABER has recently filed a Petition for Rulemaking, concerning shared use of 900 MHz paging frequencies. Comments on NABER's petition are due June 10, 1992.

In view of the above, AMTA urges the Commission to extend until July 17, 1992, the date on which it may file Comments on the Fleet Call Petition.

CERTIFICATE OF SERVICE

I, M.A. Spinks, a secretary in the law office of Lukas, McGowan, Nace & Gutierrez, hereby certify, that I have on this 29th day of May, 1992, sent via United States first class mail, a copy of the foregoing **REQUEST FOR EXTENSION OF TIME** to the following:

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