

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

Accelerating Wireless Broadband Deployment by)	WT Docket No. 17-79
Removing Barriers to Infrastructure Investment)	
)	
Accelerating Wireline Broadband Deployment by)	WC Docket No. 17-84
Removing Barriers to Infrastructure Investment)	

JOINT MOTION TO ALIGN COMMENT DATES

CTIA,¹ Competitive Carriers Association,² and the Wireless Infrastructure Association³ (collectively, the “Parties”) respectfully ask the Federal Communications Commission (“FCC” or “Commission”) to harmonize the schedule for comments on the *Notice of Proposed Rulemaking and Notice of Inquiry* in WT Docket No. 17-79, with the schedule for comments on the *Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment* in WC Docket No. 17-84.⁴ Specifically, the Commission should order that initial comments in these closely related proceedings are due by **June 15, 2017**, and reply comments are due by **July 17, 2017**.

¹ CTIA® (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association’s members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry’s voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry’s leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

² CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes nearly 100 competitive wireless providers ranging from small, rural carriers serving fewer than 5,000 customers to regional and national providers serving millions of customers. CCA also represents approximately 200 associate members including vendors and suppliers that provide products and services throughout the mobile communications supply chain.

³ The Wireless Infrastructure Association, formerly PCIA, is the principal organization representing the companies that build, design, own and manage telecommunications facilities throughout the world. Its over 230 members include carriers, infrastructure providers, and professional services firms.

⁴ See *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, Notice of Proposed Rulemaking and Notice of Inquiry*, FCC 17-38, WT Docket No. 17-79 (rel. Apr. 21,

Despite being adopted by the Commission on the same day, the two items were published on different days in the Federal Register. Based on these different publication dates, comments and reply comments in WT Docket No. 17-79 are currently due on June 9, 2017 and July 10, 2017, respectively, while comments and reply comments in WC Docket No. 17-84 are due June 15, 2017 and July 17, 2017.⁵ Modifying the comment cycle in WT Docket No. 17-79 by approximately one week to match the comment cycle in WC Docket No 17-84 will promote the filing of unified comments, and ultimately benefit both commenters and the Commission.

This brief modification of the comment schedule for WT Docket No. 17-79 is warranted given the substantial overlap in these proceedings. Both proceedings share a common objective to address and remove federal, state, and local regulatory barriers that impede the deployment of network infrastructure needed to provide high-speed broadband nationwide.⁶ Although WT Docket No. 17-79 addresses some issues that affect wireless providers (such as interpretations of Section 332 of the Communications Act), and WC Docket No. 17-84 addresses some issues affecting wireline providers (including copper retirement and the Section 214(a) discontinuance process), many issues that the Commission raises in the items affect both wireless and wireline providers. For example, both proceedings ask how the Commission should

2017) (“*Wireless NPRM and NOI*”); *Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment*, Notice of Proposed Rulemaking, Notice of Inquiry, and Request for Comment, FCC 17-37, WT Docket No. 17-84 (rel. Apr. 21, 2017) (“*Wireline NPRM, NOI, and RFC*”).

⁵ Because the Federal Register published different portions of WC Docket No. 17-84 on different days, resulting in disparate comment deadlines within the same proceeding, the Wireline Competition Bureau revised those deadlines “to effectuate the Commission’s intent for consistent comment and reply comment dates, and to avoid any confusion regarding filing deadlines.” *Wireline Competition Bureau Announces Deadlines for Filing Comments and Reply Comments in the Wireline Infrastructure Proceeding*, Public Notice, DA 17-473, WC Docket No. 17-84 (rel. May 16, 2017). The same rationale supports aligning the comment schedules for both proceedings.

⁶ *Wireless NPRM and NOI* ¶ 2 (noting that the objective of the proceeding is to remove “regulatory impediments”); *Wireline NPRM, NOI, and RFC* ¶ 2 (noting that the objective of the proceeding is to remove “regulatory barriers”).

interpret Section 253 of the Communications Act—which applies to all telecommunications carriers—to fulfill Section 253’s objective to prohibit state and local regulatory obstacles to new telecommunications service. Additionally, WC Docket No. 17-84 asks how the Commission can streamline the pole attachment process to achieve the purposes of Section 224 of the Communications Act, which also applies to all telecommunications providers, and specifically asks questions about wireless as well as wireline attachments to poles. Hence, the two proceedings are inextricably linked.

Given the many overlapping questions, issues, and proposals in the two proceedings, unified comment dates will benefit commenters and the Commission. Industry will be able to respond to common topics through a single filing, and the Commission will receive fewer and more concise filings that can address overlapping issues at one time. No party will be adversely affected by this modification.

Although the Commission has noted that such modifications are not routinely granted, grant of this request is warranted given the short modification of time, the unique circumstances, and the benefits to all parties and the Commission from a unified comment schedule. Accordingly, the Parties respectfully request that the Commission modify the comment and reply comment deadlines in WT Docket 17-79 to June 15, 2017 and July 17, 2017, respectively.

Respectfully submitted,

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