

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of

Transforming the 2.5 GHz Band

WT Docket No. 18-120

**JOINT MOTION FOR EXTENSION OF COMMENT CYCLE**

The Schools, Health & Libraries Broadband Coalition (SHLB Coalition); the North American Catholic Educational Programming Foundation (NACEPF); Voqal; Educators and Broadband Providers for American Rural Communities (EBPARC); the School Board of Broward County, Florida; Florida Gateway College; Florida Atlantic University; Miami-Dade County Public Schools; Public Knowledge; and the Open Technology Institute at New America (collectively, Joint Stakeholders) respectfully request, pursuant to 47 C.F.R. § 1.46, a 60-day extension of the time set to file comments and reply comments responsive to the Federal Communication Commission (FCC or Commission) Notice of Proposed Rulemaking (NPRM) in the above-captioned docket.<sup>1</sup>

Each of these parties welcomes the Commission’s decision to initiate this rulemaking, which has the potential to (1) expand educational broadband benefits to more students, schools, and families; (2) foster broadband deployment in rural areas, including on tribal lands, many of which have limited or no service today; and (3) accelerate the deployment of 5G wireless networks to more Americans. However, Joint Stakeholders require additional time to respond

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<sup>1</sup> *Transforming the 2.5 GHz Band*, Notice of Proposed Rulemaking, WT Docket No. 18-120, FCC 18-59 (rel. May 10, 2018) (“NPRM”).

fully, given the broad scope of the NPRM, the complexity of the issues it raises, and the challenges of a summer comment cycle for educators. The FCC should provide enough time to build a thorough record for its ultimate decision by ensuring that all interested parties have sufficient opportunity to develop and submit responsive comments.

Joint Stakeholders represent a diverse set of parties united by their shared interest in engaging in the FCC's rulemaking proceeding to provide the Commission with the information it needs to determine the best rules to advance service in the 2.5 GHz Educational Broadband Service (EBS) band. Since the Commission's adoption and release of the NPRM, we have been working diligently to respond to it. However, the Commission provided only 30 days for comments, and 30 additional days for reply comments, after official publication. Comments are now scheduled to be due on July 9, 2018, and reply comments are scheduled to be due on August 6, 2018. While we recognize "[i]t is the policy of the Commission that extensions of time shall not be routinely granted,"<sup>2</sup> we believe an extension is warranted here for the following reasons.

First, the issues raised by the NPRM are as complex as they are important. As noted, the future of the EBS band holds great potential for closing the digital divide, advancing next generation wireless technology, and solving real gaps in educational broadband connectivity. However, identifying the approaches that will best achieve these objectives is not simple, as illustrated by the many questions and proposals in the NPRM. For example, with respect to how best to rationalize the geographic areas of existing EBS licenses, the NPRM seeks comment on different license area sizes and thresholds, as well as how to address potential overlaps among rationalized licensees. Complex geospatial analysis is required to fully evaluate the impacts of these various approaches. Additional time is needed to allow those parties that wish to engage in

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<sup>2</sup> 47 C.R.F. § 1.46(a).

such analysis to help provide the Commission with the accurate coverage data necessary to make this decision.

Second, this proceeding is far from routine. Prior Commissions have failed to take any action on the EBS band for over a decade. While many parties, including several of the Joint Stakeholders, have been urging the FCC for some time to move forward to assign the 2.5 GHz spectrum that has remained vacant in much of the country, the final NPRM—as adopted by the Commission—does much more. Indeed, the NPRM seeks comment on proposals and asks questions about nearly all aspects of the EBS band, for existing and future licensees, including open-ended calls for creative thinking about whether and how to transform the band. No one is well served by a rush to decision on a less than complete record. We welcome the FCC's decision to take action here, but we require additional time to respond thoroughly to the broad scope of the final NPRM.

Finally, the short comment and reply comment cycle falls in the middle of the summer and includes the end of the school year and graduations, as well as the July 4<sup>th</sup> holiday. This timing is particularly difficult for schools and educators, who have much at stake and wish to engage in this proceeding. For over 50 years, the Commission has designated parts of the 2.5 GHz band for educational purposes. There can be no dispute that the proposed EBS reforms could significantly impact broadband connectivity for the schools and other educational organizations, particularly in rural areas, that rely on EBS today or may do so in the future. By advancing the comment cycle so that it extends into the fall, the Commission can better ensure that all interested parties can meaningfully participate in the proceeding.

For these reasons, Joint Stakeholders respectfully request that the Commission extend the current comment cycle by 60 days to ensure that all interested parties have sufficient time to

provide the Commission with the information necessary to ensure the best use of the 2.5 GHz band.

Respectfully submitted,



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