

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

In the Matter of )  
 )  
Policies Regarding Mobile Spectrum ) WT Docket No. 12-269  
Holdings )  
 )

To: The Commission

**MOTION FOR WAIVER OF PAGE LIMITS**

T-Mobile USA, Inc. (“T-Mobile”)<sup>1</sup> hereby requests permission to file a single Reply to the Oppositions to the Petition for Reconsideration filed by T-Mobile in the above-captioned proceeding (“*Mobile Spectrum Holdings Report and Order*”)<sup>2</sup> and to exceed the specified page limitation set forth in the Commission’s rules. Section 1.429 of the Commission’s rules limits replies to oppositions to petitions for reconsideration to 10 pages.<sup>3</sup> Section 1.48(b) allows for the filing of requests to exceed otherwise applicable page limitations, and this request is timely.<sup>4</sup>

The *Mobile Spectrum Holdings Report and Order* raises complex and important issues addressing competition in the mobile broadband marketplace. Furthermore, the policies adopted in this proceeding will impact the “once-in-a-lifetime” Incentive Auction, the outcome of which is likely to influence greatly the mobile broadband market for many years to come.<sup>5</sup> Although requests to file pleadings in excess of the prescribed pleading length are not routinely granted,

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<sup>1</sup> T-Mobile USA, Inc. is a wholly owned subsidiary of T-Mobile US, Inc., a publicly traded company.

<sup>2</sup> *Policies Regarding Mobile Spectrum Holdings: Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Report and Order, 29 FCC Rcd 6133 (2014) (“*MSH Report and Order*”).

<sup>3</sup> 47 C.F.R. § 1.429(g).

<sup>4</sup> *Id.* § 1.48(b).

<sup>5</sup> See *MSH Report and Order*, Statement of Chairman Thomas E. Wheeler.

the Commission has granted motions for good cause where, as here, the issues in the underlying proceeding are complex and significant.<sup>6</sup>

Moreover, Section 1.429 of the rules allows petitioners to file a reply to each of the oppositions in a proceeding.<sup>7</sup> There have been at least three oppositions filed as of September 26, 2014.<sup>8</sup> Accordingly, with three oppositions, T-Mobile would have a total 30 pages to respond by filing three 10-page replies. T-Mobile would prefer to file a single opposition, and although it does not anticipate it will require 30 pages to reply to the three oppositions, it believes it will require more than 10 pages. The Commission has granted requests for consolidated pleadings in the past where, as here, the consolidation would be more efficient for both the interested party and the Commission Staff.<sup>9</sup>

For the foregoing reasons, T-Mobile respectfully requests leave to file a singly Reply that exceeds the 10 page limitation of the Commission's Rules.

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<sup>6</sup> See, e.g., *In re Connect America Fund, et al.* Order, 26 FCC Rcd 16998 ¶ 4 (WCB, WTB 2011) (increasing page limits for petitions for reconsideration from 25 to 40 pages, noting the length and complexity of issues in the underlying order); *In re Amendment of Parts 1, 21, 72, 74, and 101 of the Commission's Rules to Facilitate the Provision of Fixed and Mobile Broadband Access, et al.*, Order, 21 FCC Rcd 8731 ¶ 5 (WTB 2006) ("*Fixed Mobile Broadband Access Order*") (extending page limits for oppositions and replies to petitions for reconsideration from 25 and 10 to 50 and 20 pages, respectively); *In re 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, et al.*, Order, 18 FCC Rcd 16554 ¶ 2 (MB 2002) (increasing the page limits for petitions for reconsideration, oppositions, and replies, citing the complexity and importance of issues in the proceedings).

<sup>7</sup> See 47 C.F.R. § 1.429(g).

<sup>8</sup> Opposition of AT&T to T-Mobile's Petition for Reconsideration, WT Docket No. 12-269 (filed Sept. 24, 2014); Opposition of Mobile Future to Petitions for Reconsideration, WT Docket No. 12-269 (filed Sept. 24, 2014); Opposition of Verizon to Petitions for Reconsideration, WT Docket No. 12-269 (filed Sept. 24, 2014). As of Friday, September 26, 2014 at noon, these three oppositions had not yet posted to the Commission's Electronic Comment Filing System, suggesting that to the extent that there are other petitions, they would not yet be posted.

<sup>9</sup> See *Fixed Mobile Broadband Access Order* ¶ 4 (finding that "consolidated oppositions and replies would be more efficient for interested parties and Commission staff and would enable the issues to be analyzed more quickly").

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Respectfully submitted,

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