

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

In the Matter of)	
)	
Applications of AT&T Inc., Plateau Telecommunications, Inc., E.N.M.R. Telephone Cooperative, New Mexico RSA 4 East Limited Partnership, and Texas RSA 3 Limited Partnership for Consent to Assign Licenses and Authorizations)	WT Docket No. 14-144
)	
Application of AT&T Mobility Spectrum LLC and Club 42CM Limited Partnership for Consent to Assign Licenses)	WT Docket No. 14-145
)	

**MOTION BY COMPETITIVE CARRIERS ASSOCIATION FOR EXTENSION OF
PLEADING CYCLE**

Competitive Carriers Association (“CCA”), pursuant to Section 1.46 of the Commission’s Rules, respectfully requests a brief extension of the pleading deadlines for the two above-captioned transactions.¹ Specifically, CCA seeks a seven business-day extension of the initial petition deadline, from October 8 to October 17, 2014, for both transactions, so that parties may have an adequate opportunity to review the written answers and documents produced in response to the Commission’s recent information requests to the parties.²

¹ AT&T Inc. and Plateau Wireless Seek FCC Consent to the Assignment of Advanced Wireless Services, Cellular, Lower 700 MHz, and Microwave Licenses, and International Section 214 Authorizations from Plateau Wireless to AT&T Inc., WT Docket No. 14-144, *Public Notice*, DA 14-1287 (WTB rel. Sept. 8, 2014) (“*Plateau Public Notice*”); AT&T Mobility Spectrum LLC and Club 42CM Limited Partnership Seek FCC Consent to the Assignment of Two Lower 700 MHz B Block Licenses in California, WT Docket No. 14-145, *Public Notice*, DA 14-1288 (WTB rel. Sept. 8, 2014) (“*Club 42CM Public Notice*”) (collectively the “*Public Notices*”).

² See Letter from Roger C. Sherman, Chief, WTB to Michael P. Goggin, WT Docket No. 14-144 (Sept. 22, 2014); Letter from Roger C. Sherman, Chief, WTB to Launa Waller, WT Docket No. 14-144 (Sept. 22, 2014); Letter from Roger C. Sherman, Chief, WTB to

CCA is the nation’s leading association for competitive wireless providers and stakeholders across the United States. CCA’s membership includes more than 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 consisting of small businesses, vendors, and suppliers that service carriers of all sizes. CCA actively participates in Commission proceedings on spectrum policy and in its reviews of secondary market transactions. Spectrum is a critical input for CCA’s carrier members, especially low-band spectrum that travels farther in rural areas and penetrates buildings.

In the Mobile Spectrum Holdings Order, in which it revised its spectrum screen, the Commission expressly recognized the importance of access to low-band spectrum holdings to expanding existing coverage areas and to promoting competition.³ As such, the Commission will now analyze transactions resulting in further concentration of below-1-GHz spectrum as an “enhanced factor” under its existing case-by-case review.⁴ The Commission’s *Public Notices* reaffirm that the above-captioned transactions will be reviewed under its new analysis.⁵ And

Michael P. Goggin, WT Docket No. 14-145 (Sept. 22, 2014); Letter from Roger C. Sherman, Chief, WTB to Puneet Wadhwa, WT Docket No. 14-145 (Sept. 22, 2014) (collectively the “*Information Requests*”).

³ See *Policies Regarding Mobile Spectrum Holdings, et al., Report and Order*, WT Docket No. 12-269, *et al.*, 29 FCC Rcd. 6133, 6162 ¶ 58 (2014) (“*MSH R&O*”); see also *id.* at 6239, ¶ 283 (“we also find that spectrum holdings by service provider in the limited low- (*i.e.*, below-1-GHz) bands have become particularly concentrated.”).

⁴ See *id.* at 6239, ¶ 283.

⁵ See *Plateau Public Notice* at 2; *Club 42CM Public Notice* at 1-2.

once again highlighting the significance of this valuable spectrum, the Commission issued the *Information Requests* to the parties to these transactions.⁶

Currently, responses to the *Information Requests* are due Monday, October 6, just two days before the initial pleading deadline of October 8. The narrative responses and underlying documentation to be produced in response to the *Information Requests* will provide necessary information about AT&T's need for this additional spectrum, in addition to other data. It would therefore serve the public interest if parties intending to participate in the pleading cycle for these transactions were allowed more than 48 hours to review these responses. The Commission has previously granted extension requests premised on the requesting party's ability to review pertinent information recently made available to the public.⁷

For the reasons set forth herein, CCA urges the Commission to expeditiously grant its request for a brief, seven business-day extension of the initial pleading deadline for the above-captioned transactions. In the interest of fairness, CCA would also support a corresponding extension of the other deadlines by an equal amount of time.

⁶ See generally *Information Requests* (and accompanying attachments).

⁷ See 2014 Quadrennial 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, MB Docket No. 14-50 *et al.*, DA 14-926 ¶ 5 (rel. June 27, 2014) (noting that the extended deadlines “w[ould] provide commenters a sufficient opportunity to fully develop their comments and reply comments in the 2014 Quadrennial Review FNPRM to include any facts, information or positions that are implicated by the content of the 2014 323 Report.”).

Respectfully submitted,

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