

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

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| In the Matter of |) | |
| |) | |
| Use of Spectrum Bands Above 24 GHz For Mobile Radio Services |) | GN Docket No. 14-177 |
| |) | |
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| Petition for Rulemaking of the Fixed Wireless Communications Coalition to Create Service Rules for the 42-43.5 GHz Band |) | RM-11664 |

To: The Commission

**SATELLITE INDUSTRY ASSOCIATION REQUEST FOR EXTENSION OF TIME FOR
COMMENT AND REPLY COMMENT DEADLINES**

The Satellite Industry Association (“SIA”) requests an extension of time for the comment and reply comment deadlines in the above-captioned proceeding, which are currently set for December 16, 2014 and January 15, 2015, respectively.¹ Pursuant to Section 1.46 of the Commission’s rules,² SIA requests that these deadlines be extended by thirty days such that comments would be due January 15, 2015 and reply comments would be due February 17, 2015.³ Such a short-term extension is in the public interest because it will allow interested parties an opportunity to address fully the important, complex and novel questions proposed on the future of spectrum use and sharing above 24 GHz. In particular, an extension will allow SIA and its members to better prepare a thorough, fact-based response to the Commission’s questions in the NOI.

¹ *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services*, GN Docket No. 14-177, et al., Notice of Inquiry, FCC 14-154 (rel. Oct. 17, 2014) (“NOI”).

² 47 C.F.R. § 1.46.

³ A thirty-day extension from January 15, 2015 falls on February 14, 2015, which is a Saturday and Monday, February 16, 2015 is a federal holiday (President’s Day). Therefore, SIA is requesting an extension until Tuesday, February 17, 2015.

In the NOI, the Commission asks whether frequency bands above 24 GHz can share spectrum or are compatible with advanced mobile wireless in millimeter wave bands.⁴ As the NOI explains, satellite operations are authorized in many of the frequency bands above 24 GHz, including in the following frequency bands highlighted by the FCC in the NOI: the LMDS band (27.5-28.35 GHz, 29.1-29.25 GHz, and 31-31.3 GHz); the 39 GHz Band (38.6-40 GHz); the 37/42 GHz Bands (37.0-38.6 GHz and 42.0-42.5 GHz); 70/80 GHz Bands (71-76 GHz, 81-86 GHz); and the 24 GHz Bands (24.25-24.45 GHz and 25.05-25.25 GHz).⁵

Even looking at one band for spectrum sharing with widely-deployed mobile wireless services requires extensive analysis and review. Here, however, the Commission is seeking comment on multiple frequency bands across a broad range of radio spectrum. Each of these frequency bands is unique and requires an analysis of current and future operations of SIA's members and how those operations might share with new terrestrial wireless services. In order to provide adequate time for such analyses, the Commission should extend the comment period.⁶

While SIA understands that it is not the policy of the Commission to routinely grant a motion for extension of time,⁷ there are multiple precedents in which extensions of comparable length have been granted in similar circumstances.⁸ Furthermore, since the NOI is not tied to a

⁴ NOI ¶ 16.

⁵ NOI ¶¶ 54-55, 59-61, 67, 73, 77, 79-80, 86.

⁶ *Improving Communications Services for Native Nations*, Order, 26 FCC Rcd 6811, 6811 ¶ 3 (CGB 2011) (extending the comment period because it was “beneficial to the development of a complete record on the issues”).

⁷ 47 C.F.R. § 1.46(a).

⁸ *Acceleration of Broadband Deployment*, Order, 26 FCC Rcd 11363, 11364, ¶ 3 (WCB 2011) (granting a 31 day extension of time to respond to a Notice of Inquiry); *Empowering Parents and Protecting Children in an Evolving Media Landscape*, Order, 25 FCC Rcd 269, 270, ¶ 3 (MB 2011); *Improving Communications Services for Native Nations*, 26 FCC Rcd at 6811 ¶ 4. Additionally, there is no imminent or pressing need for the FCC to receive comments in this proceeding. As stated in the NOI, “there is as yet no consensus definition of 5G” and standards

statutory or other regulatory deadline, there is no reason for the FCC not to grant a short thirty-day extension of time in order to facilitate the establishment of a comprehensive and fully-articulated record.⁹ Accordingly, coupled with the complex nature of this proceeding and the need for the satellite industry to provide fact-based responses, a thirty-day extension of the comment and reply comment period is warranted. Therefore, the public interest would best be served by the FCC extending the comment period to be able to collect a more fulsome fact-based record.

For all of the reasons stated above, a thirty-day extension of the comment period to January 15, 2015 and the reply comment period to February 17, 2015 is warranted and in the public interest.

Respectfully Submitted,



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setting may go into 2018 with expected initial deployment not until 2020. *See* NOI ¶¶ 7-8. Accordingly, SIA's request for a limited extension of time will not harm the public interest because the additional thirty days cannot delay the public eventually utilizing 5G.

⁹ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the, Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, Order, 29 FCC Rcd 10408, 10409 ¶ 3 (WCB 2014) (denying an extension of time request where a statute imposed a deadline to complete review).