

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

In the Matter of)	
)	
Amendment of Part 15 of the Commission’s Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and)	GN Docket No. 14-165
)	
)	
Amendment of Part 74 of the Commission’s Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap)	
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)	
Promoting Spectrum Access for Wireless Microphone Operations)	GN Docket No. 14-166
)	
)	
Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions)	GN Docket No. 12-268
)	

JOINT REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT DEADLINES

CTIA – The Wireless Association®, 4G Americas, the Aerospace & Flight Test Radio Coordinating Council, Inc., the Consumer Electronics Association, and the Telecommunications Industry Association (collectively, “Petitioners”), hereby respectfully submit this request for an extension of the comment and reply comment deadlines in the above-captioned proceedings, currently set for January 5, 2015 and January 26, 2015.¹ The Petitioners hereby request that

¹ *Amendment of Part 15 of the Commission’s Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission’s Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap*, Notice of Proposed Rulemaking, FCC 14-144 (Sept. 30, 2014) (“*Unlicensed NPRM*”); *Promoting Spectrum Access for Wireless Microphone Operations*, Notice of Proposed Rulemaking, FCC 14-145 (Sept. 30, 2014) (“*Wireless Microphones NPRM*”).

comments be due no later than February 4, 2015 and that reply comments be due no later than February 25, 2015. A 30 day extension is in the public interest to allow interested parties to meaningfully respond to the numerous technical questions raised by the Commission in these proceedings. Further, because these proceedings are inherently linked by common technical issues, the Commission should maintain parallel comment and reply comment deadlines for the two proceedings.

In particular, Petitioners seek an extension of time to permit interested parties to analyze the complicated technical issues raised by these proceedings, and to develop data-driven responses to the Commission's inquiries. In its two Notices of Proposed Rulemaking, the Commission has sought comment on: (1) changes to its Part 15 technical rules that would allow for various unlicensed operations in the 600 MHz band while protecting primary users from interference,² and (2) means of accommodating wireless microphones in 600 MHz and other spectrum bands while safeguarding the interests of other users of these bands.³ These proceedings will draw the interest of a diverse group of affected stakeholders, each of whom will need to closely analyze the proposed rules and their technical implications. The requested extension will allow these parties to closely consider the Commission's proposed rules and to develop a more robust record on these issues by submitting more detailed responses in the above-captioned proceedings. This extension would be particularly useful for parties in light of the upcoming holidays that fall within the window to file comments.

Petitioners recognize that requests to extend filing deadlines are not routinely granted, but the Commission has previously concluded that an extension is warranted when such an extension

² *Unlicensed NPRM* ¶ 3.

³ *Wireless Microphones NPRM* ¶¶ 3-4.

is necessary to ensure that the Commission receives full and informed responses and that affected parties are given a meaningful opportunity to develop a complete record for the Commission's consideration.⁴ In particular, the Commission has found such extensions to be warranted in proceedings that raise complex technical issues.⁵ Petitioners believe that the proposed extension of time is appropriate and will permit interested parties to incorporate a greater level of technical specificity into their comments and reply comments.

⁴ See, e.g., *Wireless Telecommunications Bureau and Office of Engineering and Technology Extend Period to File Comments and Reply Comments in Response to Notice of Inquiry on Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Public Notice, DA 14-1703 (WTB/OET 2014) (stating that “we agree that an extension of time to file comments and reply comments is warranted to ensure that the Commission obtains a complete and thorough record . . .”); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419 (WTB rel. June 24, 2009) (granting 14-day extension in order for “development of a complete record on the issues”); *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) (“we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto”).

⁵ See, e.g., *Wireless E911 Location Accuracy Requirements*, Order, 29 FCC Rcd 5923, ¶ 3 (PSHSB 2014) (“Specifically, we find that extension of the reply comment deadline . . . is warranted to provide commenters with sufficient time to prepare reply comments that fully respond to the complex technical, economic, and policy issues raised in the *Third Further Notice* and comments filed thereafter.”); *Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band*, Order, 27 FCC Rcd 14162, ¶¶2-3 (WTB/OET 2012) (noting petitioners’ statement that the proceeding “involves complex technical and operational issues” and finding that “providing an extension will serve the public interest by allowing all parties additional time to consider and discuss the complex issues in the wireless microphone proceeding.”).

For the foregoing reasons, an extension of time will help ensure the development and submission of a more thorough and meaningful record for the Commission to consider.

Respectfully submitted,

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