

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

In the Matter of	)	
	)	
Amendment of Part 15 of the Commission's	)	ET Docket No. 14-165
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	)	
	)	
Expanding the Economic and Innovation	)	GN Docket 12-268
Opportunities of Spectrum Through Incentive	)	
Auctions	)	
	)	
Promoting Spectrum Access for Wireless	)	GN Docket No. 14-166
Microphone Operations	)	

To: Federal Communications Commission  
(Filed electronically through ECFS)

**COMMENTS OF CP COMMUNICATIONS, LLC**  
**IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE COMMENTS**

1. CP Communications, LLC ("CP Communications" or "Company"), submits these Comments in support of the Motion for Extension of Time to File Comments filed by Shure Incorporated ("Shure") on December 2, 2014, in the above-captioned proceeding.<sup>1</sup> Shure requests

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<sup>1</sup> See *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 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, et. al.*, ET Docket No. 14-165, GN Docket No. 12-268, Notice of Proposed Rulemaking, FCC 14-144 (rel. Sept. 30, 2014)

a 45-day extension of the deadlines, such that comments would be due by February 19, 2015, and reply comments would be due by March 12, 2015. Shure points out the importance of these NPRMs to the wireless microphone industry and the breadth of the issues raised. Shure also points out that an extension will cause no prejudice or hardship to interested parties while allowing those same interested parties the time to prepare and file informed and informative comments in the proceedings. This is true especially in light of comment dates falling after a major holiday. Extending the deadlines will enable interested parties sufficient opportunity to review and respond to the variety of issues raised by the NPRMs.

2. CP Communications is a leading source for the rental of wireless production equipment -- including wireless microphones, wireless in-ear monitors, wireless intercom and wireless cueing -- to the broadcast, theatrical, live event, film, corporate, entertainment and other industries. CP Communications also sets up, manages, and supervises the operation of wireless equipment for its customers. However, CP Communications would be classified as small businesses under any definition, whether by the Commission or the Small Business Administration, and the resources required to review the NPRMs and respond adequately are limited especially during the current comment window which encompasses several major holidays. CP Communications has substantial contracts to be completed over the holidays which will occupy the time of the personnel required to respond to the NPRMs.

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(“*White Spaces NPRM*”) 79 Fed. Reg. 69,710 (Nov. 21, 2014); *In the Matter of Promoting Spectrum Access for Wireless Microphone Operations, et. al.*, GN Docket Nos. 12-268, 14-16, Notice of Proposed Rulemaking, FCC 14-145 (rel. Sept. 30, 2014) (“*Wireless Microphone NPRM*”) (Collectively, the “*NPRMs*”; 79 Fed. Reg. 69,387 (Nov. 21, 014). Currently, comments related to the NPRMs are due on January 5, 2015, and reply comments are due on January 26, 2014.

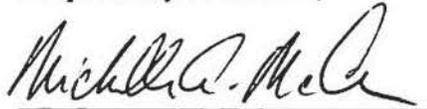
3. Alternatively, if the Commission does not see fit to grant Shure's request, CP Communications would request that the Commission at least extend the filing deadline for comments to January 12, 2015, and for filing reply comments and to January 26, 2015, as it did for the proceeding seeking comment on measures to facilitate the final conversion of LPTV and TV translator stations to digital service.<sup>2</sup>

4. Accordingly, as Shure has shown good cause for its request, CP Communications urges the Commission to grant the relief requested by Shure by extending the comment deadlines such that the deadline for filing comments would be February 19, 2015, and reply comments would be due by March 12, 2015 or alternatively to extend the comment deadlines until January 12, 2015 and reply comments to January 26, 2015 to correspond with the extension granted for the LPTV and TV translator stations proceeding.

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December 3, 2014

Respectfully submitted,



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<sup>2</sup> See *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television, Television Translator, and Television Booster Stations*, MB Docket No. 03-185, Order, DA 14-1727, 29 FCC Rcd 12536 (2014)(rel. December 1, 2014).

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