

Before the
Federal Communications Commission
Washington, DC

In the Matter of:)
)
Petition for Rulemaking of the)
Samuelson-Glushko Technology) Docket No. RM-11750
Law & Policy Clinic (TLPC) and)
J. Pierre de Vries)

Blanket Consent to and Request for Consent to Electronic Service

The Samuelson-Glushko Technology Law & Policy Clinic (TLPC) and J. Pierre de Vries respectfully consent to and request consent to electronic service via e-mail from supporters and opponents of the above-referenced petition.¹ Specifically: pursuant to Rules 1.405(a) and 1.47(d), we agree to accept—and indeed, would *strongly prefer*—service of statements of support and oppositions in electronic form via e-mail to blake.reid@colorado.edu in lieu of service by mail of paper copies.² Conversely, we respectfully ask supporters and opponents to preemptively agree in their statements of support and oppositions—or in separate accompanying statements—to accept electronic service of replies pursuant to Rule 1.405(b) and 1.47(d) in lieu of service by mail of paper copies and to specify an e-mail address to which they would prefer responses be served.³

Because the TLPC is a law school clinic staffed primarily by student attorneys and is on hiatus during the summer months, we have minimal access to administrative support and face significant delays in retrieving documents in paper form delivered via mail and significant burdens in serving documents in paper form. Electronic service via e-mail

¹ *Public Notice* (June 11, 2015), <http://apps.fcc.gov/ecfs/comment/view?id=60001060847>; *Petition for Rulemaking* (May 8, 2015), <http://apps.fcc.gov/ecfs/comment/view?id=60001031161>.

² See 47 C.F.R. §§ 1.405(a) (requiring proof of service on petitioners in conformity with rule 1.47), 1.47(d) (requiring paper service unless parties accept service in another form).

³ See 47 C.F.R. §§ 1.405(b) (same as 1.405(a) for responses), 1.47(d).

would be a fully viable substitute for paper service in this proceeding and is fully consistent with the Commission's migration toward allowing electronic submission of all documents in all proceedings.

While the Commission's rules still require paper service of statements in support of and oppositions to petitions for rulemaking and replies to statements and oppositions, the Commission recently changed its procedures to allow for the electronic submission of petitions for rulemaking, noting its "work toward the goal of providing such capabilities for every type of filing that the public might submit."⁴ In advance of an official migration of the Commission's rules toward full electronic service for petitions for rulemaking, we thank supporters and opposers in advance for their consideration of our circumstances and for their willingness to pilot bilateral electronic service in this proceeding.

* * *

Please don't hesitate to contact us if you have any questions regarding this filing.

Respectfully submitted,

/s/

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Cc:

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Brian Regan, Wireless Telecommunications Bureau

⁴ *Commission Announces That Petitions for Rulemaking May Be Submitted Online* (Mar. 19, 2015), https://apps.fcc.gov/edocs_public/attachmatch/DA-15-356A1.pdf.