

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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| In the Matter of |) | |
| |) | |
| Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment |) | ET Docket No. 15-170 |
| |) | |
| Request for the Allowance of Optional Electronic Labeling for Wireless Devices |) | RM-11673 |
| |) | |

MOTION FOR EXTENSION OF TIME

The Consumer Electronics Association (“CEA”),¹ pursuant to Section 1.46 of the Commission’s rules,² respectfully requests a two-week extension of the time for filing initial comments and a three-week extension of the time for filing reply comments in the above-captioned proceeding. The Notice of Proposed Rulemaking (“*Notice*”)³ establishes initial comment and reply comment deadlines of 30 and 45 days, respectively, after the date the *Notice* is published in the Federal Register. Publication occurred on August 6, 2015, establishing

¹ The Consumer Electronics Association is the technology trade association representing the \$285 billion U.S. consumer electronics industry. More than 2,000 companies enjoy the benefits of CEA membership, including legislative and regulatory advocacy, market research, technical training and education, industry promotion, standards development and the fostering of business and strategic relationships. CEA also owns and produces CES – The Global Stage for Innovation. All profits from CES are reinvested into CEA’s industry services.

² 47 C.F.R. § 1.46.

³ Amendment of Parts 0, 1, 2, 15 and 18 of the Commission’s Rules Regarding Authorization of Radiofrequency Equipment; Request for the Allowance of Optional Electronic Labeling for Wireless Devices, *Notice of Proposed Rulemaking*, ET Docket No. 15-170, RM-11673 (rel. July 21, 2015).

comment and reply comment deadlines of September 8, 2015 and September 21, 2015, respectively.⁴

CEA appreciates the Commission's proposals to update the rules that govern the evaluation and approval of radiofrequency ("RF") devices.⁵ This is a complex and technical area that is important as "one of the primary means the Commission uses to ensure that RF devices operating in the United States do not cause harmful interference and otherwise comply with [the FCC's] rules."⁶ As a trade association, CEA requires sufficient time to coordinate with its member companies, which, in turn, must coordinate internally to review and develop responses to the Commission's proposals. The 30-day comment period is insufficient for this purpose, particularly in the late summer/Labor Day holiday time frame when many key individuals at CEA's member companies are more likely to be out of the office. In order to provide the most thorough, thoughtful input in response to the *Notice* and best assist the Commission in its critical reform efforts, CEA requests an extension of two weeks, *i.e.*, to September 22, 2015, to file comments in this proceeding.

In addition, rather than requesting a similar two-week extension for reply comments, CEA urges the Commission to allow an additional week (*i.e.*, to extend the reply comment deadline by three weeks to October 13, 2015).⁷ The *Notice* established an unusually short time period of 15 days for reply comments. For the same reasons that additional time is necessary to

⁴ 80 FR 46900, available at <https://www.federalregister.gov/articles/2015/08/06/2015-18402/equipment-authorization-and-electronic-labeling-for-wireless-devices>. The thirtieth day after publication, September 5, 2015, falls on a weekend, and Monday, September 7, 2015, is the Labor Day holiday.

⁵ *Notice*, ¶ 1.

⁶ *Id.*, ¶ 2.

⁷ Monday, October 12, 2015 is the Columbus Day holiday.

consider the Commission’s proposals in the comment round, interested parties will need more than two weeks to review and respond to the arguments set forth in comments, many of which are likely to be technical and complex. The proceeding ultimately will benefit from the more informed, considered input that parties can provide with additional time. CEA submits that this extension – ultimately, just three additional weeks for the comment cycle beyond the time frame contemplated by the *Notice* – should have no adverse impact on any interested party or on the proceeding.⁸

⁸ As the *Notice* explains, the Commission is required under the Enhance Labeling, Accessing, and Branding of Electronic Licenses Act (“E-LABEL Act”) to “promulgate regulations or take other appropriate action, as necessary, to allow manufacturers of radiofrequency devices with display the option to use electronic labeling for the equipment in place of affixing physical labels to the equipment,” and the Commission proposes to do so in the *Notice*. *Notice*, ¶ 93. If the Commission determines that the requested extension would inappropriately delay the agency’s implementation of the E-LABEL Act, CEA requests the Commission to extend the comment and reply comment deadlines as requested for all sections of the *Notice* other than Section III(C)(1), Labeling, which addresses the E-LABEL Act requirements.

Accordingly, for the reasons discussed above, CEA requests the Commission to extend the comment deadline to September 22, 2015 and the reply comment deadline to October 13, 2015.

Respectfully submitted,

CONSUMER ELECTRONICS
ASSOCIATION

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