

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

In the Matter of

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

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission’s rules,<sup>1</sup> the American National Standards Institute (ANSI) Accredited Standards Committee C63<sup>®</sup> (“ASC C63”) hereby requests a 30-day extension of the deadlines for submitting both comments and reply comments in the above-captioned proceeding.<sup>2</sup> ASC C63 recognizes that it is not the Commission’s policy to routinely grant extensions of time in rulemaking proceedings.<sup>3</sup> However, a 30-day extension of both the comment and reply comment periods is warranted in this instance to facilitate a more thorough consideration of the important issues raised by the Commission. Moreover, such an extension will not burden any party or cause an undue delay in the administrative process.

---

<sup>1</sup> 47 C.F.R. § 1.46

<sup>2</sup> See *Amendment of Parts 0, 1, 2, and 15 of the Commission’s Rules regarding Authorization of Radiofrequency Equipment and Request for the Allowance of Optional Electronic Labeling for Wireless Devices*, Notice of Proposed Rulemaking (rel. July 21, 2015) (“NPRM”). The current deadline for submitting comments is September 8, 2015 and the current deadline for submitting reply comments is September 21, 2015.

<sup>3</sup> See 47 C.F.R. §1.46(a)

The extension requested here is in the public interest because it will afford interested parties the time necessary to address the complicated technical and policy questions raised in the NPRM and develop appropriate responses. More specifically, ASC C63 – whose measurement standards are referenced throughout the NPRM – is concerned that the current deadline may impact its ability to obtain and coordinate input from its members, many of whom will be attending the IEEE EMC Conference in Dresden, Germany during the week of August 17<sup>th</sup> and others who are on summer vacations. As the Commission knows, ASC C63 is a voluntary standards making organization accredited by ANSI with approximately thirty (30) members representing government organizations, manufacturers, test laboratories, military and other professional organizations. With added time to discuss and confer on the NPRM, the comments and reply comments of ASC C63 will better integrate the views of its participating members.

ASC C63 understands that the Commission must satisfy certain Congressional deadlines relevant to the Enhance Labeling, Accessing and Branding of Electronic Licenses Act (E-LABEL Act). If this presents a problem for the Commission, ASC C63 suggests bifurcating the NPRM into separate dockets, one dealing with E-LABEL Act issues and the other with the remaining issues, with separate comment and reply comment periods for each proceeding.

Accordingly, ASC C63 respectfully requests 30-day extensions of the deadlines for filing comments and reply comments in response to the NPRM as set forth herein.

Respectfully submitted,

/s/ Mr. Daniel Hoolihan

Mr. Daniel Hoolihan  
Chairman,  
American National Standards Institute  
Accredited Standards Committee C63®

Terry G. Mahn  
Jay S. Newman  
Fish & Richardson P.C.  
1425 K Street, N.W., 11<sup>th</sup> Floor  
Washington, DC 20005  
Counsel to ANSI ASC C63®