

In the Matter of

WIRELESS TELECOMMUNICATIONS BUREAU SEEKS COMMENT ON AN  
APPROPRIATE METHOD FOR DETERMINING THE PROTECTED CONTOURS FOR  
GRANDFATHERED 3650-3700 MHZ BAND LICENSEES

GN Docket No. 12-354

Request for Extension of Comment and Reply Comment Deadline to Public Notice  
(DA-1208)

The Wireless Innovation Forum hereby submits this request for a 15-day extension of the comment and reply comment deadlines in response to the above-captioned Public Notice.

After the release of the 3650 MHz Public Notice, the Wireless Innovation Forum's Spectrum Sharing Committee established a Task Group to address the questions raised in the Notice. The Task Group has facilitated dialog among representatives of both the Part 90 (WISPs and utilities) and Part 96 (potential SAS providers, equipment manufacturers, and wireless carriers) communities, in an attempt to reach consensus on the protection framework and protection criteria for Part 90 systems during the transition period.

The Task Group is making good progress and has reached general agreement on some specific aspects of Part 90 protections. However, because substantive comments filed by the Wireless Innovation Forum must be balloted prior to submission, we are unable to submit the results of the Task Group's discussions on a timescale consistent the Public Notice's short comment window.

While the Wireless Innovation Forum generally desires that the Commission act as expeditiously as possible in opening the 3.5 GHz band for innovative new services, we believe that the Commission will benefit from having, on the record, the consensus views of the majority of incumbents and new operators in the 3650 MHz band, and that the Commission and the community in general will benefit from having the ability to consider replies to these comments. We also believe that this short extension will have no measurable impact on the date at which Part 96 services are first realized.

For the foregoing reasons, the Wireless Innovation Forum respectfully requests an extension of the comment deadline in the above-captioned Public Notice to December 28<sup>th</sup>, 2015, and January 12<sup>th</sup>, 2016, respectively.

Respectfully submitted,

Lee Pucker  
CEO, Wireless Innovation Forum  
December 7<sup>th</sup>, 2015