

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

In the Matter of)
)
Use of Spectrum Bands Above 24 GHz For) GN Docket No. 14-177
Mobile Radio Services)
)
)

To: The Commission

**SATELLITE INDUSTRY ASSOCIATION, GLOBAL VSAT FORUM, EMEA
SATELLITE OPERATOR’S ASSOCIATION, AND TELECOMMUNICATIONS
INDUSTRY ASSOCIATION REQUEST FOR EXTENSION OF TIME FOR REPLY
COMMENT DEADLINE**

The Satellite Industry Association (“SIA”), the Global VSAT Forum (“GVF”), the EMEA Satellite Operator’s Association (“ESOA”), and the Telecommunications Industry Association (“TIA”) request an extension of time for the reply comment deadline in the above-captioned proceeding, which is currently set for February 23, 2016.¹ Pursuant to Section 1.46 of the Commission’s rules,² SIA, GVF, ESOA, and TIA request that this deadline be extended by three days such that reply comments would be due February 26, 2016.

Such a short-term extension is in the public interest because it will allow interested parties an opportunity to fully address the important, complex and novel questions proposed on the future of spectrum use and sharing above 24 GHz. In particular, an extension will allow parties who are filing reply comments to better prepare thorough, fact-based responses to the comments filed in this proceeding.

¹ *Use of Spectrum Bands Above 24 GHz For Mobile Radio Services*, GN Docket No. 14-177, et al., Notice of Proposed Rulemaking, FCC 15-138 (rel. Oct. 22, 2015) (“NPRM”).

² 47 C.F.R. § 1.46.

The Commission is seeking comment on multiple frequency bands across a very broad range of the radio spectrum, and many of the comments filed in this proceeding contain detailed licensing proposals and technical information. Multiple services are currently authorized in many of the frequency bands above 24 GHz, including in the following frequency bands highlighted by the FCC in the NPRM: the LMDS band (27.5-28.35 GHz); the 39 GHz Band (38.6-40 GHz); the 37 GHz Bands (37.0-38.6 GHz); and the 64-71 GHz Band.³ Each of these frequency bands is unique and requires an analysis of current and future operations. Additionally, due to inclement weather many comments were submitted and posted for review two or three days after the original comment filing deadline. In order to provide adequate time for the necessary analyses, the Commission should extend the comment period.⁴

While SIA, GVF, ESOA, and TIA understand that it is not the policy of the Commission to routinely grant a motion for extension of time,⁵ there are multiple precedents in which extensions of comparable length have been granted in similar circumstances.⁶ Furthermore, since the NPRM is not tied to a statutory or other regulatory deadline, there is no reason for the FCC not to grant a short three-day extension of time in order to facilitate the establishment of a

³ NPRM ¶¶ 25-35, 35-47, 47-54, 54-60.

⁴ *Improving Communications Services for Native Nations*, Order, 26 FCC Rcd 6811, 6811 ¶ 3 (CGB 2011) (extending the comment period because it was “beneficial to the development of a complete record on the issues”).

⁵ 47 C.F.R. § 1.46(a).

⁶ *Acceleration of Broadband Deployment*, Order, 26 FCC Rcd 11363, 11364, ¶ 3 (WCB 2011) (granting a 31 day extension of time to respond to a Notice of Inquiry); *Empowering Parents and Protecting Children in an Evolving Media Landscape*, Order, 25 FCC Rcd 269, 270, ¶ 3 (MB 2011); *Improving Communications Services for Native Nations*, 26 FCC Rcd at 6811 ¶ 4. Additionally, there is no imminent or pressing need for the FCC to receive reply comments in this proceeding. As stated in the NPRM, “there is much that is unknown about all future uses of the mmW bands.” and standards setting may go into 2017 with expected initial deployment not until 2020. See NPRM fn. 1, ¶¶ 7, 23. Accordingly, SIA’s request for a limited extension of time will not harm the public interest because the additional ten days will not delay the public eventually utilizing 5G.

comprehensive and fully-articulated record.⁷ For all of these reasons, a three-day extension of the reply comment period is warranted.

Respectfully Submitted,

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⁷ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, GN Dkt No. 14-126, Order, DA 14-1258 ¶ 3 (denying an extension of time request where a statute imposed a deadline to complete review).

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