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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of the Commission's Rules)
To Establish New Personal Communications)
Services, Narrowband PCS)
)
Implementation of Section 309(j) of the)
Communications Act — Competitive Bidding,)
Narrowband PCS)

GEN Docket No. 90-314 ✓
ET Docket No. 92-100

PP Docket No. 93-253

**MOTION OF THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION
FOR EXTENSION OF TIME**

The Personal Communications Industry Association ("PCIA"),¹ by its attorneys,
respectfully requests that the Commission extend by thirty days the deadlines for the filing of
comments and reply comments in response to the Second Further Notice of Proposed
Rulemaking in the above-captioned docket.² At present, comments are due to be filed on July 5,
2000, with replies due July 20, 2000. For the reasons stated below, additional time is needed to
permit PCIA and its members to explore fully the channelization options and other issues raised

¹ PCIA is an international trade association created to represent the interests of the commercial and private mobile radio service communications industries and the fixed broadband wireless industry. PCIA's Federation of Councils includes: the Paging and Messaging Alliance, the PCS Alliance, the Site Owners and Managers Association, the Private System Users Alliance, the Mobile Wireless Communications Alliance, and the Wireless Broadband Alliance. As an FCC-appointed frequency coordinator for the Industrial/Business Pool frequencies below 512 MHz, the 800 and 900 MHz Business Pools, the 800 MHz General Category frequencies for Business Eligibles and conventional SMR systems, and the 929 MHz paging frequencies, PCIA represents and serves the interests of tens of thousands of licensees.

² *Amendment of the Commission's Rules To Establish New Personal Communications Services, Narrowband PCS*, FCC 00-159 (rel. May 18, 2000) (Second Report and Order and Second Further Notice of Proposed Rulemaking) ("*Second Further Notice*").

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in the *Second Further Notice* and to develop a consensus position (including obtaining the necessary levels of membership review before filing with the Commission).

The current rulemaking phase of this docket raises very significant business and operational issues for the messaging industry and marketplace. PCIA and its members currently are evaluating potential band plans for the reserve NBPCS spectrum as well as the Commission's proposals for possible rechannelization of the existing unlicensed NBPCS channels. This process requires consideration of a range of technical issues as well as the potential implications for existing and future business plans and the effective provision of service to the public.

As the trade association for the narrowband PCS industry, PCIA has been actively involved in this proceeding from the beginning. Since the issuance of the *Second Further Notice*, PCIA has been working with its members to identify options and develop consensus positions in response to the Commission's proposals and questions. PCIA is hopeful that it will be able to develop substantial consensus on the issues raised in the pending *Second Further Notice*. Putting together a consensus position on behalf of a significant portion of the messaging industry should assist the Commission in its considerations in this proceeding and ultimately facilitate the provision of service over the remaining unlicensed NBPCS frequencies.

Given the importance of this proceeding to the future of the messaging industry, PCIA believes that the brief extension it seeks is in the public interest. A brief delay in the process at this point in time should be more than compensated for by the fact that the final order will be based on a more complete record and also based on consensus.

PCIA therefore respectfully requests that the comment deadline in the above-captioned proceeding be extended until August 4, 2000, and the reply comment deadline be extended until August 21, 2000.

Respectfully submitted,

PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION

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