

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C.**

*In the Matter of*

Spectrum Policy Task Force Seeks Public  
Comment on Issues Related to  
Commission's Spectrum Policies

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DA 02-1311  
ET Docket No. 02-135

**REQUEST FOR EXTENSION OF TIME**

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June 24, 2002

*Attorneys for the SDR Forum*

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Pursuant to Section 1.46 of the Commission's rules, the Software Defined Radio ("SDR") Forum hereby respectfully requests an extension of time in the comment period for the *Public Notice* recently issued in the above-referenced proceeding.<sup>1</sup> Specifically, the SDR Forum seeks an additional 30 days to prepare comments.

The SDR Forum is an open, non-profit corporation dedicated to supporting the development and deployment of flexible, adaptable wireless systems based on SDR technology. The SDR Forum has 102 members from the Americas, Europe, and Asia. It spans commercial, defense, and civil government organizations, and includes wireless service providers, network operators, component and equipment manufacturers, hardware and software developers, regulatory agencies, user groups, and members of the academic community.

SDR is a combination of hardware and software technologies that allow the development and deployment of wireless networks, base stations, and user terminals that can operate across a range of existing services, and can adapt to support new services as they are developed. Our

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<sup>1</sup> In re Spectrum Policy Task Force Seeks Public Comment on Issues Related to Commission's Spectrum Policies, Public Notice, ET Docket No. 02-135, DA 02-1311, rel. Jun 6, 2002.

vision is to advance the development of software defined radios to enable high quality, ubiquitous, competitively priced wireless networking systems, equipment, and services with advanced capabilities. The mission of the SDR Forum is to accelerate development, deployment, and use of software-definable radio systems consistent with this vision.

The SDR Forum believes that technologies such as SDR are critical to the systemic evaluation of spectrum policies that will be the focus of the Spectrum Policy Task Force. Nevertheless, the *Notice* raises far-reaching questions that appear to contemplate a complete restructuring of the Commission's approach to regulating spectrum. While the Forum is eager to participate in this proceeding, the Commission's effort is more likely to bear fruit if commenting parties receive adequate time to consider the issues raised and formulate detailed responses. A time extension of thirty days would give parties an opportunity to craft more meaningful comments, and yield far more information for the Commission.

In addition, the Forum is presently consumed with studies and research involving implications of SDR download and RF reconfiguration, as described in the recent *First Report and Order* on SDR,<sup>2</sup> and is working diligently to prepare an Interim Report to the Commission by mid-July (with a Final Report to follow in December 2002). The membership of the Forum requires additional time to ensure a reasoned collection of views on such an all-encompassing topic as spectrum management. Of course, even without the existence of pressing deadlines relating specifically to Commission approval of SDR devices, thirty-two days is insufficient time to prepare as reasoned a response to the *Notice* as would be desirable.

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<sup>2</sup> In re Authorization & Use of Software Defined Radios, First Report & Order, 16 FCC Rcd 17373, at ¶ 32 (2001) (requiring the SDR Forum and other interested parties to report to the FCC on security developments within one year).

Hence, the SDR Forum respectfully requests that the Commission extend the announced dates by four weeks, with a view to improving the quantity and quality of submitted comments.

Respectfully submitted,

By: \_\_\_\_\_/s/\_\_\_\_\_  
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