

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

In the Matter of)	
)	
Service Rules for Advanced Wireless Services)	WT Docket No. 04-356
in 1915-1920 MHz, 1995-2000 MHz, 2020-2025)	
MHz and 2175-2180 MHz Bands)	
)	
Service Rules for Advance Wireless Services)	WT Docket No. 02-353
in the 1.7 GHz and 2.1 GHz Bands)	

**REQUEST FOR EXTENSION OF COMMENT DEADLINE
OF
CTIA – THE WIRELESS ASSOCIATION™**

CTIA – The Wireless Association™ (“CTIA”) hereby requests a 14-day extension of the comment deadline in the above-captioned proceeding from November 23, 2004 to December 7, 2004 in order to complete and analyze testing and technical analyses necessary to address 1915-1920/1990-1995 MHz (“H Block”) interference concerns.¹ CTIA also requests a commensurate extension of time for reply comments to ensure parties have adequate time to study the test results provided in the initial round of comments.

In the *NPRM*, the Commission recognized the issue of “potential interference from handsets transmitting in the 1915-1920 MHz band to PCS handsets receiving in the 1930-1990 MHz band”² – a concern CTIA shares.³ The Commission has thus sought comment on proposed out-of-band emission (“OOBE”) limits and reduced power limits for handsets operating at 1915-

¹ See In the Matter of Service Rules for Advanced Wireless Services in 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands, WT Docket No. 04-356, *Notice of Proposed Rulemaking*, FCC 04-218 (rel. Sept. 24, 2004) (“*NPRM*”).

² *Id.* ¶ 86.

³ See, e.g., Letter to Marlene H. Dortch, Secretary, FCC, from Paul Garnett, CTIA, ET Docket No. 00-258 (Aug. 18, 2004).

1920 MHz band. Significantly for purposes of the instant request, the Commission “invite[s] commenters to provide test data and specific technical analyses in support of the OOB limits they recommend” and states that commenters “should provide a detailed justification for the limits they recommend” if they advocate “different OOB limits ... for CDMA and GSM/TDMA handsets ...”⁴ Similarly, with respect to the *NPRM*’s suggested handset power limit, the Commission asks that commenters “submit test reports and technical analyses or studies in support of their recommendations.”⁵ Thus, with respect to interference to adjacent channel licensees from H block operations, the Commission has placed significant importance on the technical information it receives in response to the *NPRM*.

Following adoption of the *NPRM*, the wireless industry took up the Commission’s request and contracted with two independent laboratories to conduct test programs responsive to the issues raised by the interference questions identified in the *NPRM*. The testing has been extensive and arduous. The tests involve examination of interference scenarios among three different technologies, CDMA, GSM, and UMTS; further, within each technology, the tests have examined an array of handsets intended to reflect a representative sample of PCS subscribers. The testing, moreover, has required an assessment of how these various technologies interact, *e.g.*, how CDMA operations in the H block would affect CDMA, GSM, and UMTS PCS operations; each technology, of course, requires different test set-up and simulation. In addition, the testing has taken into account the impact of H block interference under various environments. As a result, this testing has taken time and is not yet completed. While industry is moving as quickly as practicable, given the timing of the test schedule it is clear that the testing and subsequent analysis necessary to meaningfully comment on the H block adjacent channel

⁴ *NPRM* ¶ 91.

⁵ *Id.* ¶ 107.

interference issues raised in the *NPRM* will not be completed by the current November 23, 2004 comment deadline.

CTIA understands that extensions of time for filing deadlines are not routinely granted. The Commission has nonetheless recognized that rulemaking proceedings involving complex technical issues often warrant an extension of time of comment and reply comment deadlines, particularly when such issues require further studies and analysis.⁶ The 14-day extension of the comment and reply comment deadlines requested herein is of comparatively short duration and will not undermine the Commission's interest in timely completing the instant rulemaking proceeding.⁷ Further, the Commission has also determined that when such issues are under consideration in a rulemaking proceeding, the fact that many interested parties' technical personnel and subject matter experts will be on vacation during the end-of-calendar year holiday season also is a legitimate basis for an extension.⁸

For the reasons set forth above, an extension of time to enable industry to complete the testing plan described above will help ensure that accuracy and completeness of the data requested by and submitted to the Commission, and is consistent with the public interest. A commensurate extension of the reply comment deadline will enable parties to study the testing

⁶ See, e.g., *Unlicensed Operation in the TV Broadcast Bands, Additional Spectrum for Unlicensed Devices below 900 MHz and in the 3 GHz Band*, Order Granting Extension of Time, ET Docket Nos. 04-186, 02-380, DA-04-2655, ¶ 4 (OET rel. Aug. 25, 2004) (granting 90-day extension to allow parties to work on technical studies and meet to resolve issues raised in Notice); *Procedures to Govern the Use of Satellite Earth Stations on Board Vessels in the 5925-6425 MHz Bands and 14.0-14.5 GHz/11.7-12.2 GHz Bands*, Order Extending Comment Period, 19 FCC Rcd. 3958, ¶ 2 (IB 2004) (granting 30-day extension due to complex technical issues raised).

⁷ See *supra* notes 6 (Bureau orders granting extensions ranging from 30-90 days).

⁸ See, e.g., *Telephone Number Portability*, Order, 18 FCC Rcd. 26604, ¶ 5 (WCB 2003) (granting 3-week extension due to complex technical and competitive issues and impact of holiday); *Digital Broadcast Copy Protection*, Order, 17 FCC Rcd. 19740, ¶¶ 2-3 (MB 2002) (granting 5-week extension to enable commenters "to complete a technical analysis of issues raised by the *NPRM*" and in recognition of Thanksgiving holiday).

results provided in the initial round of comments. Accordingly, CTIA requests that the Commission extend the comment and reply comment deadlines to December 7, 2004 and January 21, 2005, respectively.

Respectfully submitted,

/s/ Diane Cornell

CTIA – THE WIRELESS ASSOCIATION™

1400 16th Street, NW Suite 600
Washington, D.C. 20036
(202) 785-0081

Diane Cornell
Vice President, Regulatory Policy

Paul Garnett
Director, Regulatory Policy

Its Attorneys

November 19, 2004