

December 20, 2004

Ed Thomas  
Chief, Office of Engineering Technology  
Federal Communications Commission  
445 Twelfth St., SW  
Washington, DC 20554



Re: *CEA Request for Extension of Time in ET Docket No. 04-186.*

Dear Mr. Thomas:

On December 13, 2004, the Consumer Electronics Association (CEA) submitted a request for a 45-day extension of time to formulate replies in this docket.

New America Foundation (NAF) does not oppose this request. However, NAF wishes to express its concern that this proceeding not be unduly delayed. The Bureau has already granted a 90-day extension to formulate initial comments. This extension will therefore constitute a delay of more than 135 days following publication in the Federal Register, which did not occur until June 18, 2004. As the *Order* was released May 25, 2004, parties have enjoyed a delay of nearly 160 days over and above the 75 days contemplated for comment and 30 days contemplated for reply in this proceeding.

NAF recognizes that this proceeding presents complex questions and that formulation of complete replies will benefit all parties. However, NAF also believes that it will best serve the public interest to resolve the issues raised in the *NPRM* speedily, so that devices taking advantage of broadcast spectrum can be deployed to the benefit of the public. NAF therefore requests that the Bureau make clear that it will grant no further extensions except in the most extraordinary circumstances.

Respectfully Submitted,

Harold Feld  
Associate Director  
Media Access Project  
*Counsel for New America Foundation*