

**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)	

**MOTION TO EXTEND REPLY COMMENT DEADLINE
OF
CTIA – THE WIRELESS ASSOCIATION™**

CTIA – The Wireless Association™ (“CTIA”) hereby requests a 15-day extension of the reply comment deadline in the above-captioned proceeding, from January 24, 2005 to February 8, 2005, to allow parties to complete comprehensive analyses of the numerous technical studies submitted in the initial round of comments with respect to interference issues that arise from new operations in the 1915-1920/1995-2000 MHz block, the so-called “H Block.” As CTIA expressed previously, it supports the adoption of flexible use, market-oriented service rules in the band – but urges the Commission to adopt adequate safeguards to ensure that H Block operations do not result in harmful interference to nearby licensees.¹ The extension of time will enable parties to analyze further the technical studies and respond meaningfully in the proceeding.

In the underlying *NPRM*, the Commission requested comment on the potential for interference raised by H Block operations and thus sought test data and specific technical

¹ See Comments of CTIA at 1-2, WT Docket Nos. 04-356, 02-353 (filed Dec. 8, 2004).

analyses in support of interference protection recommendations.² On November 19, 2004, following filings by CTIA and TerreStar Networks, Inc., the Commission issued an order to extend the comment and reply comment dates in this proceeding by 15 days “to enable parties sufficient time to complete testing and to analyze the many important issues raised in the NPRM with the benefit of test results.”³ Parties responded with specific, detailed, and lengthy technical analyses addressing these issues. The additional time sought herein will allow CTIA and other parties to complete their analyses of the technical data and present informative submissions on reply to the Commission.

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.⁴ Indeed, the Commission recently extended a reply comment date another 30 days in another proceeding after previously

² *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, WT Docket Nos. 04-356, 02-353, Notice of Proposed Rulemaking, ¶¶ 91, 107 (rel. Sept. 24, 2004).

³ *Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, WT Docket Nos. 04-356, 02-353, Order, DA-04-3664, ¶ 2 (WTB rel. Nov. 19, 2004).

⁴ *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).

extending the comment and reply comment dates by 90 days.⁵ Therein, the Commission concluded, “We believe there is considerable value in this rule making in allowing time for further technical analysis and for the various parties to develop consensus solutions to interference issues.”⁶ The 15-day extension of the reply comment deadline requested herein is of comparatively short duration and will not undermine the Commission’s interest in timely completing the instant rulemaking proceeding.⁷

For the reasons set forth above, an extension of time will help ensure that parties have the opportunity to submit reply comments that meaningfully respond to the technical data raised in the initial round, and is consistent with the public interest. Accordingly, CTIA requests that the Commission extend the reply comment deadline to February 8, 2005.

Respectfully submitted,

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⁵ See *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-04-4013 (OET rel. Dec. 22, 2004) (granting an addition 30-day extension for reply comments).

⁶ *Id.* ¶ 3.

⁷ See *supra* note 4 (Bureau orders granting extensions ranging from 30-90 days).