

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

In the Matter of:)	
)	
Improving Public Safety Communications In the 800 MHz Band)	WT Docket No. 02-55
)	
Consolidating the 800 and 900 MHz Industrial/ Land Transportation and Business Pool Channels)	
)	
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz for Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Services)	ET Docket No. 00-258
)	
Petition for Rule Making of the Wireless Information Networks Forum Concerning the Unlicensed Personal Communications Service)	RM-9498
)	
Petition for Rule Making of UT Starcom, Inc. Concerning the Unlicensed Personal Communications Service)	RM-10024
)	
Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile Satellite Service)	ET Docket No. 95-18
)	
To: The Commission		

MOTION FOR EXTENSION OF TIME
AND ADJUSTMENT OF PROCEDURAL DATES

Coastal SMR Network, L.L.C. and its affiliates¹ ("Coastal/A.R.C."), licensees of 27 EA and 138 high-site Specialized Mobile Radio Service ("SMR") authorizations in the Mid-Atlantic region, and Scott C. MacIntyre, the licensee of three EA licenses and the holder of non-controlling interests in entities holding four EA licenses and six high-site SMR licenses

¹ Commercial Radio Service Corp. and A.R.C., Inc. d/b/a Antenna Rentals Corp.

(collectively, the “Joint Petitioners”), by their attorneys, timely filed a Joint Petition for Partial Reconsideration in the above-referenced matter on December 22, 2004. Joint Petitioners hereby respectfully request an extension of time for the filing of Oppositions to the other Petitions for Reconsideration filed in the above-referenced proceeding on December 22, 2004 until 15 days after publication of a Combined Public Notice (as described below).

On December 22, 2004 the Commission adopted a *Supplemental Order and Order on Reconsideration* (“*Supplemental Order*”).² As Joint Petitioners finalized their Petition for Partial Reconsideration for filing on December 22, 2004, they had no way of anticipating or accounting for the substance of the Commission’s *Supplemental Order*, as it modified the *Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order* in WT Docket No. 02-55, et. al, FCC 04-168 (“*Report and Order*”).³ Joint Petitioners, as well as other parties filing Petitions for Reconsideration by December 22, 2004, should be given the opportunity to supplement and to amend their Petitions in light of the *Supplemental Order*.

Accordingly, the Joint Petitioners hereby request leave to amend or to supplement their Joint Petition in light of the *Supplemental Order* until 30 days after the date of publication of the *Supplemental Order* in the Federal Register. Joint Petitioners further request that the Commission refrain from publishing in the Federal Register public notice of all the December 22, 2004 Reconsideration Petitions (as described by the Public Notice concerning “Petitions for Reconsideration and Clarification of Action” (Report 2687, rel. January 19, 2005))

² See Improving Public Safety Communications in the 800 MHz Band, *Supplemental Order and Order on Reconsideration*, WT Docket No. 02-55, et. al, FCC 04-294 (rel. Dec. 22, 2004) (“*Supplemental Order*”).

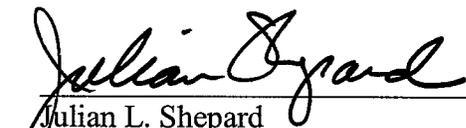
³ See Improving Public Safety Communications in the 800 MHz Band, *Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order*, WT Docket No. 02-55, et. al, FCC 04-168 (rel. August 6, 2004) (“*Report and Order*”).

until a date thereafter, *i.e.*, at least 30 days after the date of publication of the *Supplemental Order* in the Federal Register. Publication of a single Public Notice (the “Combined Public Notice”) in the Federal Register of all Petitions for Reconsideration of both the *Report and Order* (those Petitions timely filed on or before December 22, 2004) and any Petitions for Reconsideration of the *Supplemental Order* would promote administrative efficiency and would be in the public interest. Publication of a Combined Public Notice would reduce the number of separate Petitions, and the number of separate Oppositions thereto in this matter, and provide all parties a fair opportunity to present their views to the Commission in an integrated manner in light of the changes in the *Supplemental Order*. The deadlines for Oppositions to all Petitions, and Replies thereto, would then be synchronized and adjusted accordingly from the date of the Combined Public Notice.

Respectfully submitted,

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January 24, 2005

CERTIFICATE OF SERVICE

I, Angela C. Spencer, hereby certify that on January 24, 2005, a copy of the foregoing "Motion for Extension of Time and Adjustment of Procedural Dates" was served by first-class U.S. mail or other expeditious means, on the following:

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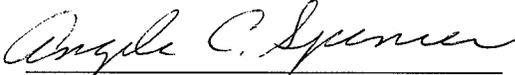
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