

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands)	WT Docket No. 06-150
)	
Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling System)	CC Docket No. 94-102
)	
Section 68.4(a) of the Commission's Rules Governing Hearing Aid-Compatible Telephones)	WT Docket No. 01-309

COMMENTS OF UNITED STATES CELLULAR CORPORATION

United States Cellular Corporation ("USCC"), by its attorneys, respectfully submits its comments in supporting grant of the CTIA – The Wireless Association ("CTIA") request for a brief extension of the comment and reply comment deadlines for the NPRM in the above-captioned proceedings.¹ CTIA requested that the comment and reply comment deadlines be extended until 14 and 28 days, respectively, after the down payment deadline following the close of Auction 66. USCC also supports, in the alternative, the request of The Rural Cellular Association ("RCA") that the comment and reply comment deadlines be extended to dates certain, such as October 30 and November 13, 2006, respectively, with the possibility that a further brief extension would be appropriate if Auction 66 does not close within the next week.

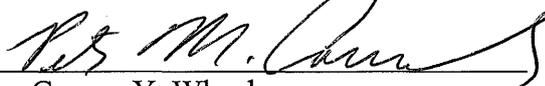
¹ See In the Matter of Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, WT Docket No. 04-356, Revision of the Commission's Rules to Ensure compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Section 68.4 of the Commission's Rules Governing Hearing Aid Compatible Telephones, WT Docket No. 01-309, *Notice of Proposed Rule Making, Fourth further Notice of Proposed Rule Making, and Second Further Notice of Proposed Rule Making*, FCC 06-114 (rel. Aug. 10, 2006) ("NPRM"), 71 Fed. Reg. 485-6 (Aug. 21, 2006).

Companies such as USCC are understandably concerned that filing comments before the down payment deadline in Auction #66 with respect to possible changes in service area sizes for certain licenses, alteration of band plans, such as possibly splitting the Upper 700 MHz D Block or possible future uses of 700 MHz spectrum could involve disclosures of information which could raise anti-collusion compliance issues. As pointed out by CTIA, all Auction 66 short-form applicants “must affirmatively avoid all communications with or disclosures to each other that affect or have the potential to affect bids or bidding strategy, which may include communications regarding the post-auction market structure.” Applicants may not communicate regarding their own bids, bidding strategies or otherwise communicate market specific information which might, intentionally or not, influence the bids or bidding strategies of other bidders during an auction. The Commission has also indicated that public communications such as statements made to members of the press or in public settings arguably are not exempt from the anti-collusion compliance requirements. These restrictions apply until the down payment deadline. Grant of the brief extension proposed by CTIA or the alternative version proposed by RCA is needed to encourage the development of a full record on the complex and extensive areas where the Commission has solicited comment.

It does not appear that any interested party will be significantly harmed by a brief extension of the filing deadlines on the *NPRM*. Nor will a brief extension delay the start of the auction for 700 MHz licenses. Under the circumstances, USCC requests that the Commission act favorably on the CTIA request or, alternatively, on the RCA request to extend the comment and reply comment dates until October 30 and November 13, 2006, respectively.

Respectfully submitted,

UNITED STATES CELLULAR CORPORATION

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