

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554**

IN THE MATTER OF:	)	
	)	
Former Nextel Communications, Inc.	)	
Upper 700 MHz Guard Band Licenses	)	WT Docket No. 06-169
and Revisions to Part 27 of the	)	
Commission's Rules	)	
	)	
Development of Operational, Technical	)	
and Spectrum Requirements for Meeting	)	WT Docket No. 96-86
Federal, State and Local Public Safety	)	
Communications Requirements Through	)	
the Year 2010	)	

**NOTICE OF PROPOSED RULE MAKING**

Adopted: September 6, 2006

Released: September 8, 2006

**Motion of Loudoun County, Virginia for an Extension of Time to File Comments to  
Notice of Proposed Rule Making 06-133**

Submitted on Behalf of the County Government by

Gary P. McKelvey  
Communications Systems Supervisor  
Loudoun County, Virginia

October 20, 2006

Loudoun County, Virginia respectfully requests through this motion that the Federal Communications Commission grant an extension of time in which parties can file written comments relative to Dockets 96-86 and 06-169. The proposed Dockets potentially impact the channels in the 764 – 806 public safety radio band described in 47 C.F.R. §90 Subpart R.

To strengthen the public safety communications capabilities of Loudoun County as well as all of the jurisdictions in the Washington Metropolitan Area and the National Capital Region (NCR), the County has been working closely with adjacent Regions and jurisdictions on the Region 20 700 MHz Plan.

The original thirty-day comment period of the Dockets has not provided the County with sufficient time to assess fully all of the potential issues associated with the Dockets. The specific areas of concern that the County wishes to investigate fully include, but are not limited to:

1. Discussions need to be held with other Region 20 members and adjacent Regions. The Region 20 Technical Committee will be meeting soon on this issue.
2. The potential financial impact(s) of changes, given our plans for both voice and Broadband system assignments in the 700 MHz frequency band is a major concern.
3. The potential timeline impact(s) upon our systems project schedule if the Dockets are adopted.
4. The potential impact(s) upon interoperability within the National Capital Region as well as the non-NCR jurisdictions bordering Loudoun County.
5. The potential of regulatory delays necessitated by treaty reviews with Canada and Mexico that ultimately delay the deployment of the County's 700 MHz land mobile radio system.

Loudoun County has begun discussions with our public safety neighbors; however, the thirty-day comment period has been insufficient to resolve fully all of the issues potentially associated with the Dockets. Accordingly, Loudoun County respectfully requests that the Commission to extend the period in which comments may be submitted by no less than thirty additional calendar days.

The County believes that such an extension would be helpful in the development of a thorough and complete record in this proceeding. Additionally, an extension in the comment period will allow adequate time to resolve the issues identified in this motion and should help minimize the piecemeal submission of arguments and analysis in the form of *ex parte* submissions after the reply comment deadline.

Respectfully submitted on behalf of Loudoun County, Maryland



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Gary P McKelvey  
Communications Systems Supervisor  
Department of Information Systems  
Loudoun County Virginia

and

Vice Chairman,  
Region 20 - Regional Planning Committee 700MHz