

**Before the
Federal Communications Commission
Washington, D.C. 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 Systems)	CC Docket No. 94-102
)	
Section 68.4(a) of the Commission’s Rules Governing Hearing Aid-Compatible Telephones)	WT Docket No. 01-309
)	
Biennial Regulatory Review – Amendment of Parts 1, 22, 24, 27, and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services)	WT Docket No. 03-264
)	
Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission’s Rules)	WT Docket No. 06-169
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	
Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010)	WT Docket No. 96-86

To: The Commission

**RURAL TELECOMMUNICATIONS GROUP
MOTION FOR EXTENSION OF TIME**

The Rural Telecommunications Group, Inc. (“RTG”),¹ by its attorneys, hereby respectfully

¹ RTG is a Section 501(c)(6) trade association dedicated to promoting wireless opportunities for rural telecommunications companies through advocacy and education in a manner that best represents the interests of its membership. RTG’s members have joined together to speed delivery of new, efficient, and

submits this motion seeking an extension of the deadline for filing reply comments in response to the comments filed yesterday in response to the Further Notice of Proposed Rulemaking (“FNPRM”) in the above-captioned proceedings.² Specifically, RTG requests that the dates for filing reply comments be extended to June 6, 2007. As demonstrated below, good cause exists to grant this motion for extension of time.

Reply comments are currently due to be filed no later than May 30, 2007, four business days after the deadline for filing comments. Four business days simply does not allow sufficient time to obtain and review the substantial number of extensive comments filed in this proceeding, develop a group consensus as to the nature of the response, and articulate that response in the form of reply comments. As of 2:00 this afternoon, the FCC’s Electronic Comment Filing System (“ECFS”) showed a total of 112 comments having been filed, totaling 1,850 pages in length.³ This proceeding is of critical importance to the wireless industry and to RTG members who seek to obtain 700 MHz spectrum which will enable them to deliver advanced broadband services to their rural customers. This proceeding involves a substantial number of complex issues and multiple band allocation plan options raised in the Commission’s expansive FNPRM.⁴ Additional time to examine these issues will serve the public interest since the Commission’s resolution of these issues will have a significant impact on the success or failure of the Commission’s efforts to ensure that advanced broadband services reach rural America.

innovative telecommunications technologies to the populations of remote and underserved sections of the country. RTG’s members are small, rural businesses serving or seeking to serve secondary, tertiary and rural markets. RTG’s members are comprised of both independent wireless carriers and wireless carriers that are affiliated with rural telephone companies.

² *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands; Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Section 68.4(a) of the Commission’s Rules Governing Hearing Aid Compatible Telephones; Biennial Regulatory Review-Amendment of Parts 1, 22, 24, 27 and 90 to Streamline and Harmonize Various Rules Affecting Wireless Radio Services; Former Nextel Communications, Inc. Upper 700 MHz Guard Band Licenses and Revisions to Part 27 of the Commission’s Rules; Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; Development of Operational, Technical and Spectrum Requirements for Meeting Federal, State and Local Public Safety Communications Requirements Through the Year 2010*, Report and Order and Further Notice of Proposed Rulemaking, WT Docket No. 06-150, CC Docket No. 94-102, WT Docket No. 01-309, WT Docket No. 03-264, WT Docket No. 06-169, PS Docket No. 06-229, and WT Docket No. 96-86, rel. April 27, 2007 (“Order” and “FNPRM”).

³ As of 10:00 this morning, the ECFS showed only 72 comments as having been filed, so there may well be additional comments made available to the public over the coming days.

⁴ The FNPRM portion of the FCC’s order released on April 27, 2007 is 44 pages.

To develop a meaningful record that reasonably reflects the views of rural carriers, parties must be afforded sufficient time to provide adequate and substantive input. RTG is scheduled to hold a legislative and regulatory conference for its members on May 31. A grant of the requested one week extension will allow RTG to meet and discuss the important issues raised by the comments and incorporate the results of those discussions in its reply comments. This additional time will allow RTG to submit more substantive and useful suggestions in light of the Commission's proposals and the complexity of the issues raised in the FNPRM and in the comments. As the Commission continues to develop its 700 MHz regulatory regime, it will certainly be aided by meaningful, rather than rushed, abbreviated comments addressing the impact of the various proposals under consideration.

In light of the foregoing, RTG respectfully requests that the Commission extend the due date for reply comments in this proceeding to June 6, 2007.

Respectfully submitted,

RURAL TELECOMMUNICATIONS GROUP, INC.

By: _____/s/_____

Caressa D. Bennet
Michael R. Bennet
Bennet & Bennet, PLLC
4350 East West Highway
Suite 201
Bethesda, MD 20814
(202) 371-1500

Its Attorneys

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