

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

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems)	CC Docket No. 94-102
)	
Association of Public-Safety Communications Officials – International, Inc. Request for Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket No. 05-196
)	

To: The Commission

**REQUEST FOR EXTENSION OF REPLY COMMENT DEADLINE OF
CTIA – THE WIRELESS ASSOCIATION®**

CTIA – The Wireless Association® (“CTIA”) hereby requests an extension of the reply comment deadline in the above-captioned proceeding to give all parties the opportunity to evaluate and respond to the Commission’s Enhanced 911 (“E911”) Order (“*E911 Stage One Order*”) which, when released, will address issues set for comment on September 18, 2007.¹ CTIA respectfully requests that the reply comment deadline be extended until two weeks after release of the *E911 Stage One Order*.

The instant proceeding was bifurcated into two stages. The first stage sought comment on the Commission’s tentative conclusion that carriers should be required to satisfy the Section 20.18(h) accuracy requirements at the PSAP level and, if so, whether enforcement of the rule

¹ See “FCC Clarifies Geographic Area Over Which Wireless Carriers Must Meet Enhanced 911 Location Accuracy Requirements,” FCC News Release (Sept. 11, 2007) (“*News Release*”).

should be stayed. The second stage of the proceeding (“Stage Two”), which is the subject of this request, sought comment on numerous E911 issues including:

- “[W]hat reasonable amount of time should we permit carriers to achieve compliance at the PSAP level?”²
- “What specific tasks will be necessary for carriers to come into compliance with current accuracy requirements on a PSAP-level basis?”³
- “Should the amount of time vary based on certain factors?”⁴
- “What factors should be considered?”⁵
- “Should benchmarks be established?”⁶

On September 11, 2007, one week prior to the end of the Stage Two comment cycle, the Commission adopted its *E911 Stage One Order*. According to the *News Release*, the Commission addressed the issues highlighted above that are the subject of Stage Two.⁷ Given the interplay between the *E911 Stage One Order* and issues set for comment in Stage Two, CTIA respectfully requests an extension to give all interested parties sufficient time to analyze the Order and file reply comments that are properly focused on the issues the Commission’s *E911 Stage One Order* has not foreclosed.

CTIA understands that extensions of time for filing deadlines are not routinely granted, but the procedural posture of this proceeding is unique.⁸ Moreover, the Commission has recognized that rulemaking proceedings involving complex technical questions may warrant an

² *Wireless E911 Location Accuracy Requirements*, PS Docket No. 07-114, *Notice of Proposed Rulemaking*, FCC 07-108 at ¶ 8 (rel. Jun. 1, 2007) (“*NPRM*”).

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ *Id.*

⁷ *News Release* at 1.

⁸ If the text of the *E911 Stage One Order* has not been released by September 18th, reply comments addressing an issue the Commission announced it resolved at its September 11, 2007 Open Meeting seemingly would violate the Sunshine period prohibition set forth in Section 1.1203(b)(1) of the Commission’s rules. See 47 CFR § 1.1203.

extension of time to facilitate a complete record.⁹ A short extension of the reply comment deadline — ending two weeks after release of the *E911 Stage One Order* — is thus warranted.

Respectfully submitted,

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⁹ 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).