

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band)	WT Docket No. 07-195
)	
Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands)	WT Docket No. 04-356

**COMMENTS IN SUPPORT OF
T-MOBILE REQUEST FOR EXTENSION OF TIME TO FILE COMMENTS**

The Rural Telecommunications Group, Inc. (“RTG”),¹ and the National Telecommunications Cooperative Association (“NTCA”),² (collectively the “Rural Advocates”) by their attorneys, hereby support the request of T-Mobile USA, Inc. (“T-Mobile”) that the Federal Communications Commission (“FCC” or “Commission”) extend the deadline for filing comments in the above-captioned proceeding by 90 days, to October 7, 2008.³ As T-Mobile correctly argues, additional time is necessary to conduct testing to determine the extent of interference issues raised by the FCC proposal in the Further Notice of Proposed Rulemaking, FCC 08-158 (“FNPRM”) in this proceeding. Additional time also is necessary to allow small

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 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 NTCA is a national association representing more than 570 rural telecommunications providers. While NTCA’s members are all rural incumbent local exchange carriers, most provide their rural communities with a broad array of telecommunications services, including wireless service.

³ T-Mobile Request for Extension of Time to File Comments, filed July 1, 2008, in WT Docket No. 07-195 and WT Docket No. 04-356 (“T-Mobile Request”).

and rural companies adequate opportunity to assess the impact of the Commission's proposal on the deployment of broadband wireless services in rural areas, and for the Commission to fully evaluate this impact.

T-Mobile and other parties have raised substantial questions about the risk of harmful interference from TDD operations in the AWS-3 band to FDD operations in the AWS-1 band.⁴ The Commission cannot responsibly resolve the interference issues based on the current record, and it would be arbitrary and capricious for the Commission to refuse to extend the comment period in order to accept and consider clearly relevant testing data.

In addition, small and rural companies, such as the Rural Advocates' members, need additional time to assess the impact of the Commission's plan and to comment on the FNPRM. As small companies, they lack the resources to "drop everything" to respond to the FNPRM on an abbreviated schedule. Small and rural companies typically provide services to difficult to serve, and otherwise unserved rural areas. With Sprint-Clearwire holding the licenses or leases to substantially all the BRS/EBS spectrum at 2.5 GHz and AT&T/NextWave holding substantially all the licenses for WCS spectrum at 2.3 GHz, the AWS-3 band represents the last foreseeable opportunity for small and rural companies to acquire broadband wireless spectrum. The proposal in the FNPRM, however, would eliminate entirely small and rural company participation in the provision of broadband wireless services in the AWS-3 Band. It would be arbitrary and capricious for the Commission to exclude small and rural company participation in AWS-3 services without affording such companies adequate time to participate in the rulemaking process.

Although the Rural Advocates support licensing the AWS-3 band without undue delay, the Commission's accelerated comment period is unjustified, and unjustifiable. No exigent

⁴ See, e.g., T-Mobile Request note 1.

circumstances warrant an accelerated comment schedule, and the public interest would be better served by allowing interested parties adequate time to fully consider and address the issues raised in the FNPRM.

For the reasons discussed herein and in the T-Mobile Request, the Commission should extend the deadline for filing comments in this proceeding until October 7, 2008.

Respectfully submitted,

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