

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

In the Matter of

Wireless E911 Location Accuracy
Requirements

PS Docket No. 07-114

MOTION FOR EXTENSION OF TIME

Rural Cellular Association (“RCA”) and T-Mobile USA, Inc. (“T-Mobile”), by their attorneys and pursuant to 47 C.F.R. § 1.46 of Commission’s rules, hereby request that the FCC extend the reply comment deadline established in the above-captioned proceeding for an additional seven (7) days in order to give interested parties sufficient time to adequately analyze and respond to information submitted by commenters in this proceeding.

The Commission has explained the need for an expeditious comment cycle in this proceeding by stating that “[t]his abbreviated comment cycle is appropriate given the compelling public interest in achieving accurate and reliable E911 location information.”¹ Arguably even more compelling is ensuring that all parties potentially affected by the proposals and requirements being considered have a reasonable opportunity to properly evaluate the information provided.

The FCC’s Electronic Comment Filing System (“ECFS”) indicates that at least 20 sets of comments were filed on October 6th in response to the Public Notice seeking

¹ See *Comment Sought on Proposals Regarding Service Rules for Wireless Enhanced 911 Phase II Location Accuracy Requirements*, Public Notice, PS Docket No. 07-114 (rel. Sept. 22, 2008) (“Public Notice”); see also 73 Fed. Reg. 55473.

comment on proposed changes to the Commission's E911 location accuracy requirements. While "[i]t is the policy of the Commission that extensions of time shall not be routinely granted,"² given the volume of material that needs to be reviewed, the importance of the issues being considered, and the wide-range of entities (*e.g.*, consumers, carriers, manufacturers and the public safety community) that ultimately will be affected by the outcome of this proceeding, RCA and T-Mobile believe that all interested parties should be afforded at least an additional seven (7) days to file reply comments.

RCA, for example, needs to evaluate comments relative to both handset-based and network-based solutions, and to consult with its members who utilize those technologies. In addition, many RCA members that must be consulted prior to filing reply comments are attending RCA's Business and Technical Conference in Nevada until October 9th, thereby impeding RCA's ability to provide meaningful comment in the brief timeframe currently being allotted for reviewing comments and preparing replies.

For the foregoing reasons, the FCC should extend the reply comment deadline in this proceeding by seven (7) days to allow interested parties additional time to adequately review and consider the numerous comments that were filed yesterday.

² See 47 C.F.R. § 1.46(a).

Respectfully submitted,

/s/

Todd B. Lantor
**LUKAS, NACE, GUTIERREZ & SACHS,
CHARTERED**
1650 Tysons Boulevard
Suite 1500
McLean, VA 22102
(703) 584-8671

Counsel to Rural Cellular Association

/s/

John T. Nakahata
HARRIS, WILTSHIRE & GRANNIS, LLP
1200 Eighteenth Street, NW
Washington, DC 200036
(202) 730-1300

Counsel to T-Mobile USA, Inc.

Thomas J. Sugrue
Kathleen O'Brien Ham
Sara F. Leibman
Jim Nixon
T-MOBILE USA, INC.
401 9th Street, NW, Suite 550
Washington, DC 20004
(202) 654-5900

Dated: October 7, 2008