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December 3, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

**Re: Polar Communications
2.5 GHz Transition Initiation Plan – Request for Extension of Time
Grand Forks Basic Trading Area (BTA #166)
WT Docket No. 06-136**

Dear Ms. Dortch:

On April 5, 2007, Polar Communications (“Polar”) filed its Transition Initiation Plan for the Grand Forks, North Dakota Basic Trading Area (BTA #166). Pursuant to Section 27.1232 of the Commission’s Rules, the transition is supposed to be completed by January 4, 2009 (90 days plus 18 months following the filing of the Transition Initiation Plan). For the reasons explained below, Polar hereby requests an extension of time to complete the transition.¹

There is good cause for grant of this request. The Transition Initiation Plan referenced and indicated support for the Request for Waiver (“Waiver Request”) of the transition-related rules filed on April 5, 2007 by United Telephone Mutual Aid Corporation (“United”).² As described in the Waiver Request, United’s Geographic Service Areas (“GSAs”) lie entirely within the Grand Forks BTA, such that the disposition of the Waiver Request will necessarily determine which licenses will be subject to transition and which will not. The Waiver Request indicated that licensees of 19 BRS and EBS stations desired to opt out of the transition and retain their current channels and operating parameters for multichannel video programming distribution. In addition, the Waiver Request indicated that the EBS station of Cavalier Public School District #6 (Call Sign WNC551) (“Cavalier”) would be subject to the waiver and would

¹ Copies of this extension request are being provided to each of the licensees listed on Exhibit A to Polar’s Transition Initiation Plan.

² See Public Notice, “Wireless Telecommunications Bureau Seeks Comment on Request by United Telephone Mutual Aid Corporation for Waiver of the Requirement to Transition to the New BRS/EBS Band Plan, DA 07-2189, rel. May 24, 2009.

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not be included in the transition. Following the filing of the Waiver Request, Cavalier filed applications for renewal and for extension of time to complete construction, which applications are pending before Commission staff.³

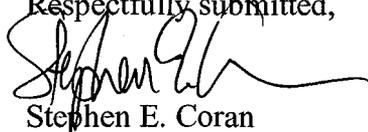
In the Transition Initiation Plan, Polar estimated that the transition would be completed by April 1, 2008, a full year after it was filed. That estimate was based on the belief that the Commission would act on the pending Waiver Request within approximately six months following the April 5, 2007 filing date. However, no decision has been rendered on any of the pending matters.

Polar's ability to complete the transition is inextricably linked to disposition of the Waiver Request and Cavalier's applications. Before the transition can be completed, Polar must know which licensees must be included in the transition. The Commission's decisions on United's Waiver Request and Cavalier's applications necessarily will dictate the identity of the licensees required to transition, the transition plan and the date for completion of the transition. So long as these matters remain pending, the transition cannot be completed.

Polar believes that the transition can be completed within 90 days following the date of the last Commission decision on the above-referenced matters. Polar requests an extension of time until such date.

Please contact undersigned counsel if there are any questions concerning this matter.

Respectfully submitted,



Stephen E. Coran

cc: John Schauble

³ See File Nos. 0002935508 and 0003066845.

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