

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

In the Matter of)	
)	
Development of Nationwide Broadband Data to)	
Evaluate Reasonably and Timely Deployment of)	
Advanced Services to All Americans,)	WC Docket No. 07-38
Improvement of Wireless Broadband)	
Subscribership Data, and Development of Data on)	
Interconnected Voice over Internet Protocol)	

REQUEST FOR EXTENSION OF TIME

Sprint Nextel Corporation (“Sprint Nextel”) respectfully requests an extension of time to file the newly revised FCC Form 477, which is due March 2, 2009 but which has not yet been made available in electronic format. Specifically, Sprint Nextel requests an extension of 15 days from the current filing date if the electronic form is available for data entry by March 2, 2009; alternatively, Sprint Nextel requests a brief extension of 15 days from the date the electronic form is made available. In support thereof, Sprint Nextel states as follows.

In its *Report and Order* released June 12, 2008, 23 FCC Rcd 9691 (2008), the Commission adopted significant changes to its FCC Form 477 in order to collect additional data on deployment of broadband services throughout the United States. The revised FCC Form 477 required the approval of the Office of Management and Budget (“OMB”), which it received on January 30, 2009. In its approval notice, OMB recognized that “[d]ue to significant changes and increased burden from the proposed revisions, FCC should be flexible with and assist respondents who may have difficulty

submitting information in the new format.”¹ Sprint Nextel has compiled the data sought by the Commission and has prepared to the best of its ability to make the filing as requested. However, without access to the form online and without knowing exactly how the electronic files will work, it cannot complete the required formatting. Thus, Sprint Nextel is requesting a brief amount of additional time after the electronic form has been made available on the FCC’s website. This extension is consistent with the flexibility OMB recommended.

Of particular concern to Sprint Nextel is Section VI, which requires broadband data broken out by state, census tract and technology. At this time, reporting providers do not have detailed instructions on how the requisite comma delimited text files will interface with the submission menu of the new form for uploading to the FCC’s website. Without this information, Sprint Nextel has no way to test the files or to determine the level of effort that will be required to correctly prepare the files for 50 states and 2 territories. Indeed, if the files prepared by Sprint Nextel do not upload properly, additional effort will be required to redo the files.

A substantial amount of information is required in these files for providers who provide nationwide service. For example, Sprint Nextel will report on 6,960 census tracts in California, 3,051 tracts in Florida and 7,840 tracts in New York. Files of this size will require a considerable amount of time to prepare, validate and upload to the FCC’s website. Allowing sufficient time to understand the uploading process and to work through any problems or technical difficulties will avoid inadvertent errors introduced by hastily filing a new report by March 2.

¹ See http://www.reginfo.gov/public/do/PRAViewICR?ref_nbr=200807-3060-004.

Thus, Sprint Nextel believes that good cause exists for a brief extension of 15 days from the current due date if the FCC Form 477 is available for data entry on or before March 2, or alternatively, for an extension of 15 days from the date the form is available for data entry if such date is after March 2.

Respectfully submitted,

SPRINT NEXTEL CORPORATION

/s/ Marybeth M. Banks

Marybeth M. Banks
Director, Government Affairs
2001 Edmund Halley Drive
Reston, VA 20191
(703) 592-5111

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