



Nadja S. Sodos-Wallace
Senior Regulatory Counsel, Assistant Secretary
815 Connecticut Avenue, NW
Suite 610
Washington, DC 20006
(202)330-4011
www.clearwire.com

March 30, 2009

WT Docket No. 06-136
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
12th Street Lobby, TW-A325
Washington, DC 20554

RE: Request for Extension of Time

Fixed Wireless Holdings, LLC
Transition of the 2500-2690 MHz Band for BRS and EBS
Transition Area: BTA Number 36: Bellingham, WA

Dear Ms. Dortch:

On November 2, 2006, Fixed Wireless Holdings, LLC, a wholly-owned subsidiary of Clearwire Corporation (together "Clearwire"), filed its Transition Initiation Plan for BTA Number 36: Bellingham, Washington. Pursuant to the Commission's Rules, that Transition was supposed to be completed by August 1, 2008. On July 31, 2008, Clearwire requested and received a six month extension to complete the Transition due to unanticipated delays associated with international coordination which were beyond Clearwire's control. On January 20, 2009, Clearwire filed a further request for an additional two month extension of time due to unanticipated delays. Clearwire finds that it has been unable to resolve the unanticipated problems with international coordination and thus, Clearwire must hereby request an additional six months in which to complete that Transition.

Clearwire has been diligently working on completing this Transition since it was initiated. It obtained all of the information required under the Commission's Rules through research of the Commission's databases and through data provided by EBS licenses in response to Clearwire's Pre-Transition Data Request. On November 2, 2006, Clearwire filed its Transition Initiation Plan with the Commission and sent its Transition Notice to all of the licensees in the BTA, as required under the rules. Clearwire then prepared its Transition Plan and on December 27, 2006, Clearwire sent the Plan out to all 2.5 GHz licensees within the Bellingham BTA. It received no counter proposals. Clearwire performed a frequency scan to confirm what was operating on the 2.5 GHz spectrum within the BTA, and found nothing out of the ordinary. It then proceeded with the Transition.



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As the Commission is aware, the Bellingham BTA borders Canada. Due to the proximity of the Bellingham BTA to the international border, and given the fact that the FCC's transition rules do not make clear the process for dealing with international borders and international operators with respect to the Transition process, Clearwire had discussions with staff to determine what was necessary. After those discussions with staff, Clearwire determined that it was necessary to reach out to the Canadian operators in the 2.5 GHz band to obtain their consent to the Transition. Clearwire then proceeded to contact the relevant Canadian operators to obtain their consent to the Transition. That process continues to take substantially longer than expected, as Clearwire continues to work towards obtaining the necessary consents.

Clearwire continues to work diligently with the Canadian operators to address their concerns before they will provide their consent. As described previously, Innuksuk raised concerns about limited spectrum availability during the Transition process. Innuksuk is the Canadian carrier operating in the lower half of the BRS/EBS band. Engineering teams from Clearwire and Innuksuk have met on conference calls bi-weekly for the last month to discuss the interchange of terrain and RF site data as each company built their propagation models and to study the interference between Innuksuk's NextNet system on the pre-transition channel plans with Clearwire's mix of NextNet and WiMax on the post-transition channel plans. The primary issue that Clearwire is attempting to resolve with Innuksuk is the affect of their Vancouver system on our Bellingham system and our Bellingham system on their Vancouver system. Innuksuk and Clearwire are currently working together to come up the conclusions for the RF modeling and then will work together to do maintenance hour testing for interference from the most likely interfering sites.

The second Canadian operator that Clearwire must coordinate with is Craig Wireless, the Canadian operator in the upper half of the BRS/EBS band. Unfortunately, Clearwire can report little progress which Craig Wireless. It is Clearwire's understanding that Craig Wireless' CEO has been the exclusive contact on this issue with Industry Canada. Unfortunately, he has not been available to discuss Craig Wireless' issues and concerns the last four or five times we have been in contact with the company. Due to his inavailability, we are now reaching out to a number of additional individuals within Craig Wireless and so we are hopeful that we will overcome these remaining obstacles very soon.

Since this delay in is beyond Clearwire's control, it respectfully asks for an additional six months to complete the Transition process and to file its Transition Completion notice. Clearwire believes that no parties will be prejudiced by grant of this request and notes that there no licensees are required to be served with this request.



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If there are any questions, please contact the undersigned at (202) 330-4011 or at nadja.sodoswallace@clearwire.com.

Sincerely,

A handwritten signature in black ink that reads "Nadja S. Sodos-Wallace".

Nadja S. Sodos-Wallace

cc: John Schauble
Lynn Ratnavale
Consuela Kearney