

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)
) CG Docket No. 09-158
Comment Sought on Measurement of Mobile) CC Docket No. 98-170
Broadband Network Performance and) WC Docket No. 04-36
Coverage)

To: The Commission

REQUEST FOR EXTENSION OF COMMENT DEADLINE

CTIA – The Wireless Association[®] (“CTIA”)¹ hereby requests a 14-day extension of the comment deadline, currently set for July 1, 2010, in the above-referenced proceeding to enable interested parties to prepare comprehensive and responsive comments to the questions presented in the Public Notice (“PN”).² An extension is necessary in the public interest to allow parties to meaningfully address the critical and substantial policy issues and complex technical questions presented in the PN.

The National Broadband Plan recommends that the Commission develop broadband performance standards for mobile services to help consumers make better choices for mobile broadband.³ In the PN, the Commission seeks comment on whether and how to pursue a measurement program for mobile broadband services and how providers can improve voluntary self-reporting of network performance and coverage, as well as answers to a vast array of questions, including: (1) the best metrics for measurement; (2) methods to gather better data; (3)

¹ CTIA – The Wireless Association[®] (www.ctia.org) is an international organization representing the wireless communications industry. Membership in the association includes wireless carriers and their suppliers, as well as providers and manufacturers of wireless data services and products.

² See *Comment Sought on Measurement of Mobile Broadband Network Performance and Coverage*, Public Notice, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36 (June 1, 2010 (“PN”).

³ Federal Communications Commission, *Connecting America: The National Broadband Plan*, 47 (rel. Mar. 16, 2010).

benefits and costs of measurement; (4) the information consumers should have about the speed of mobile broadband coverage; (5) methods for effectively communicating mobile broadband performance and coverage to consumers; and (6) measurements that are currently performed by service providers.⁴ Not surprisingly, the comments sought require a great deal of analysis in order to provide the Commission with the most complete and accurate responses to the questions posed, requiring meaningful and thoughtful consideration as parties develop and prepare their comments.

Interested parties are currently considering the PN, but given the difficult nature of the questions posed, we request that the Commission provide a 14-day extension from the July 1, 2010 comment date. The scope of the proceeding, and the implications for consumers, industry, and the economy as a whole, is unique. Additional time is necessary to ensure that stakeholders have a reasonable opportunity to evaluate proposals in the record and prepare thoughtful comments to the Commission's difficult questions.

Although the Commission does not routinely grant extensions of filing deadlines, it has often recognized that a pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses to the issues and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.⁵

⁴ See *Comment Sought on Measurement of Mobile Broadband Network Performance and Coverage*, Public Notice, CG Docket No. 09-158, CC Docket No. 98-170, WC Docket No. 04-36 (June 1, 2010 ("PN")).

⁵ See, e.g., *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) ("we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the *NPRM* and respond to the extensive comments filed in response thereto); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd. 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd. 26604, ¶ 2 (WCB 2003).

Such an extension is particularly warranted in light of the Commission's desire for input on so many varying questions relating to mobile broadband performance and coverage.

CTIA thus submits that a 14-day extension of the comment deadline through *July 15, 2010*, will enable stakeholders to more thoroughly evaluate the PN and, in turn, provide more substantive information in the comment cycle. No parties will be prejudiced by such an extension.

For the foregoing reasons, we request a 14-day extension of the reply comment deadline, to July 15, 2010.

Respectfully submitted,

/s/ David J. Redl _____

David J. Redl
Director, Regulatory Affairs

CTIA – The Wireless Association®
1400 16th Street, NW
Suite 600
Washington, DC 20036
(202) 785-0081

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