

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

In the Matter of

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

**REQUEST FOR EXTENSION OF TIME**

The Alliance for Telecommunications Industry Solutions (ATIS) hereby requests an extension of the comment deadline, in the above-referenced proceeding to enable industry and other interested parties sufficient time to adequately address the substantive policy and complex technical issues covered by the *Public Notice (PN)*. Given the numerous Federal Communications Commission (FCC) broadband-related proceedings with impending comment deadlines, ATIS believes that an extension of time is necessary to allow interested parties to gather and analyze the information necessary to prepare complete and responsive comments to the questions presented in the *PN*. ATIS recommends that the Commission extend the comment filing deadline for thirty days, from July 1 to August 2, 2010.

**I. BACKGROUND**

ATIS is a global standards development and technical planning organization committed to providing leadership for, and the rapid development and promotion of worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. ATIS' membership is diverse, including all stakeholders from the information and

communication technologies (ICT) industry – wireline and wireless service providers, equipment manufacturers, competitive local exchange carriers, data local exchange carriers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics companies, digital rights management companies, and internet service providers.

Nearly 600 industry subject matter experts from more than 250 ICT companies work collaboratively in ATIS' 18 open industry committees, which focus on a broad range of priorities for the ICT industry, including network architectures and platforms, the ordering and billing of services, E-911, cyber security, the reliability and interoperability of current and next generation technologies, the seamless delivery of converged wireline and wireless services such as IPTV over multimedia platforms, and the networks of the future.

## **II. NEED FOR RELIEF**

Given the growing significance of mobile internet access, the FCC in the *PN* 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.<sup>1</sup> To assist the FCC in addressing these issues the *PN* asks detailed questions regarding: (1) the best metrics for measurement; (2) user-generated and other methods to gather data; (3) benefits and costs of measurement; (4) publication and communication of measurement to consumers; and (5) voluntary industry standards being used to disclose mobile broadband network performance and coverage to consumers.<sup>2</sup>

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<sup>1</sup> 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).

<sup>2</sup> *Id.*

ATIS believes that the comments sought require thoughtful and careful consideration by industry to develop complete and accurate responses to the questions posed. Many industry stakeholders who seek to provide input on this proceeding are involved contemporaneously with preparing responses to other FCC broadband-related proceedings. ATIS is requesting an extension of time so that industry can gather the necessary information, analyze it and provide the FCC with a full and complete record versus one that may not be fully developed and considered. ATIS also believes such careful deliberation will better assist the FCC in implementing the National Broadband Plan's recommendation related to the development of broadband performance standards for mobile services to help consumers make better choices for mobile broadband.<sup>3</sup>

### **III. CONCLUSION**

ATIS understands that the FCC does not routinely grant extensions of filing deadlines. However, the FCC has often recognized that extending deadlines for comments is warranted when the extension would ensure that the FCC receives full and informed responses on the issues and that affected parties have a meaningful opportunity to develop a complete record for the FCC's consideration. Such an extension is particularly warranted in light of the scope and complex technical nature of the questions being posed in the *PN* and the numerous other broadband-related proceedings with impending comment deadlines.

For the reasons set-forth above, ATIS urges the FCC to extend the pleading cycle in this proceeding to August 2, 2010.

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

**WHEREFORE, THE PREMISES CONSIDERED,** ATIS respectfully submits this Request for Extension of Time for inclusion on the record in this proceeding.

Respectfully submitted,

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Dated: June 22, 2010