

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

In the Matter of)
)
Spectrum Task Force Invites Technical Input On) ET Docket No. 10-142
Approaches to Maximize Broadband Use of) WT Docket Nos. 04-356, 07-195
Fixed/Mobile Spectrum Allocations in the 2 GHz)
Range)

REQUEST FOR EXTENSION OF COMMENT DEADLINE

CTIA – The Wireless Association® (“CTIA”) hereby respectfully submits this request for a limited extension of the comment and reply comment deadlines established by Federal Communications Commission (“FCC” or “Commission”) in the above-captioned proceeding, currently set for June 17, 2011 and July 1, 2011.¹ Pursuant to Section 1.46 of the Commission’s rules, CTIA requests a 30 day extension of the deadlines such that comments would be due no later than July 18, 2011 and reply comments would be due no later than August 1, 2011. A limited thirty day extension is in the public interest to allow interested parties time to meaningfully address the complicated technical and policy issues raised by the 2 GHz Public Notice and provide a robust record.

In the 2 GHz Public Notice, the Commission’s Spectrum Task Force seeks technical input on bands co-allocated for Mobile Satellite Service (“MSS”) at 2000-2020 MHz and 2180-2200 MHz as well as Advanced Wireless Service (“AWS”) bands 1995-2000 MHz, 2020-2025 MHz, 2175-2180 MHz and 2155-2175 MHz.² More importantly, the 2 GHz Public Notice seeks

¹ See *Spectrum Task Force Invites Technical Input On Approaches to Maximize Broadband Use of Fixed/Mobile Spectrum Allocations in the 2 GHz Range*, ET Dkt. No. 10-142, WT Dkt. No. 04-356, WT Dkt. No. 07-195, Public Notice, DA 11-929 (Rel. May 20, 2011) (“2 GHz Public Notice”).

² *Id.* at 1.

information on potential band plans that could increase opportunities for successful use of 2 GHz spectrum for terrestrial mobile broadband.³ To stimulate discussion, the 2 GHz Public Notice presents three potential 2 GHz terrestrial concepts.⁴

As the Commission is well aware, CTIA and its member companies are keenly interested in obtaining additional terrestrial mobile broadband spectrum. The 2 GHz Public Notice presents an excellent opportunity to rationalize use of the existing 2 GHz spectrum, which CTIA encourages and applauds. However, the band plans and technical issues surrounding use of the 2 GHz band as well as protection of incumbent and adjacent band licensees, make the proposals in the 2 GHz Public Notice extremely complex. As such, CTIA and its member companies require significant detailed study and analysis of the ramifications of 2 GHz band plan proposals prior to reaching any level of consensus. CTIA and its member companies therefore need additional time to work cooperatively and collectively to review the Spectrum Task Force proposals, effects on existing licensees, and consideration of other spectrum that may be incorporated into an optimized mobile broadband spectrum band plan.

CTIA recognizes that requests to extend filing deadlines are not routinely granted, but the Commission often has found that a comment pleading cycle extension is warranted when necessary to ensure the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.⁵ Consistent with Commission precedent, a limited, thirty day extension of the

³ *Id.* at 2.

⁴ *Id.* at Appendix.

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

comment and reply comment deadlines is appropriate to enable affected stakeholders to more thoroughly evaluate the technical and policy issues raised by the proceeding and provide more relevant analysis for the Commission. Moreover, no parties will be prejudiced by such an extension.

For the foregoing reasons, an extension of time will help ensure the development and submission of a more robust and meaningful record for the Commission to consider.

Respectfully submitted,

By: /s/ Scott K. Bergmann

Scott K. Bergmann
Assistant Vice President, Regulatory Affairs

Christopher Guttman-McCabe
Vice President, Regulatory Affairs

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

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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).