

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

In the Matter of)	
)	
Fixed and Mobile Services in the Mobile)	ET Docket No. 10-142
Satellite Service Bands at 1525-1559 MHz)	
and 1626.5-1660.5 MHz, 1610-1626.5 MHz)	
and 2483.5-2500 MHz, and 2000-2020 MHz)	
and 2180-2200 MHz)	
)	
Service Rules for Advanced Wireless Services)	WT Docket No. 04-356
in the 1915-1920 MHz, 1995-2000 MHz,)	
2020-2025 MHz and 2175-2180 MHz Bands)	
)	
Service Rules for Advanced Wireless Services)	WT Docket No. 07-195
in the 2155-2175 MHz Band)	
)	
Spectrum Task Force Invites Technical Input)	
on Approaches to Maximize Broadband Use)	
of Fixed/Mobile Spectrum Allocations in the)	
2 GHz Range)	

**SPRINT NEXTEL CORPORATION
REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT DEADLINES**

Sprint Nextel Corporation (“Sprint Nextel”) hereby respectfully submits this request for a limited extension of the comment and reply comment deadlines established by the May 20, 2011 Public Notice 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, Sprint Nextel 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 extension is in the public

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 Docket No. 10-142; WT Docket Nos. 04-356, 07-195, Public Notice, DA 11-929 (WTB, IB, and OET rel. May 20, 2011) (“Public Notice”).

interest to allow parties to address meaningfully and thoroughly the issues raised by the Spectrum Task Force's Public Notice and provide a robust record.

The Public Notice raises several novel, far-reaching proposals and concepts as well as complex legal, technical, economic, and factual issues requiring detailed study and analysis, including particularly intricate technical and interference issues. In the Public Notice, the Spectrum Task Force seeks comment on “developing a cohesive approach that maximizes the terrestrial mobile broadband potential” of the 2 GHz spectrum.² Specifically, it seeks to “take advantage of industry technical expertise” to develop options (including “synergies with neighboring bands”) on potential 2 GHz band plans and assignment mechanisms, as well as numerous technical matters such as spectrum pairing, uplink/downlink schemes, interference issues, international harmonization, and co-existence of different services.³ Sprint Nextel is a neighboring 2 GHz licensee and has been an active participant in related proceedings.⁴ More importantly, Commission actions in the 2 GHz band would have a significant effect on the company and other members of the wireless ecosystem, including equipment providers. To facilitate the development of a full and informed record and promote the Commission's mobile broadband goals in this key proceeding, therefore, the Commission should grant an extension.

The Commission has typically afforded parties more time to comment on analogous spectrum policy proceedings than the 28 days provided by this Public Notice. For example, parties had 45 days to comment on the steps the Commission should take to promote wireless

² *Id.* at 1.

³ *Id.* at 2-4.

⁴ *See, e.g.*, Reply Comments of Sprint Nextel Corporation, WT Docket No. 04-356 (filed Aug. 11, 2008); Comments of Sprint Nextel Corporation, WT Docket 04-356 (filed Jul. 25, 2008); Reply Comments of Sprint Nextel Corporation, WT Docket No. 07-195 (filed Jan. 14, 2008); Comments of Sprint Nextel Corporation, WT Docket No. 07-195 (filed Dec. 14, 2007); Reply Comments of Sprint Nextel Corporation, IB Docket No. 05-221 (filed Aug. 15, 2005).

broadband deployment in certain frequency bands identified by NTIA.⁵ In the wireless signal boosters proceeding, parties have been afforded 45 days from publication of the Federal Register notice to file comments (resulting in more than 75 days from the date the Commission released the Notice of Proposed Rulemaking (“NPRM”)), and an additional 30 days to file reply comments.⁶ And in the public safety broadband spectrum interoperability proceeding (which, like this proceeding, involves numerous wireless technical issues), parties had 45 days from publication of the Federal Register notice to file comments (resulting in 75 days from the date the Commission released the Fourth Further Notice of Proposed Rulemaking (“FNPRM”)), and an additional 30 days to file reply comments.⁷

Moreover, the comment cycle established by the Public Notice overlaps with filing deadlines in other critical wireless proceedings, including the AT&T – T-Mobile merger proceeding,⁸ the GPS overload/desensitization issue in the LightSquared proceeding (Sprint Nextel has several representatives on the Working Group),⁹ the signal boosters proceeding

⁵ *Spectrum Task Force Requests Information on Frequency Bands Identified by NTIA as Potential Broadband Spectrum*, ET Docket No. 10-123, Public Notice, DA 11-444 (WTB and OET rel. Mar. 8, 2011).

⁶ *Wireless Telecommunications Bureau Announces Deadlines for Comments on Signal Boosters Notice of Proposed Rulemaking*, WT Docket No. 10-4, Public Notice, DA 11-855 (WTB rel. May 11, 2011) (“Signal Boosters Public Notice”).

⁷ *Service Rules for the 698-746, 747-762 and 777-792 MHz Bands*, Third Report and Order and Fourth Further Notice of Proposed Rulemaking, 26 FCC Rcd 733 (2011).

⁸ *See AT&T Inc. and Deutsche Telekom AG Seek FCC Consent to the Transfer of Control of the Licenses and Authorizations Held by T-Mobile USA, Inc. and its Subsidiaries to AT&T Inc. – Pleading Cycle Established*, WT Docket No. 11-65, Public Notice, DA 11-799 (rel. Apr. 28, 2011).

⁹ *LightSquared Subsidiary LLC; Request for Modification of its Authority for an Ancillary Terrestrial Component*, Order and Authorization, 26 FCC Rcd 566 ¶ 43 (2011).

mentioned above,¹⁰ and the “Need for Speed” proceeding (reply comments are due June 16).¹¹ Many current and potential terrestrial mobile broadband service providers and mobile satellite service providers, as well as other interested parties, are participating actively in those proceedings which, like this proceeding, will have far-reaching impact on the delivery of mobile broadband services and on the wireless industry as a whole. In addition, many of the technical staff, economic and market analysts, and legal personnel that are responsible for preparing comments in this proceeding will be fully engaged on the other proceedings until well after June 17, 2011. Thus, an extension in this proceeding is warranted to ensure that all parties have an ample opportunity to dedicate key resources to providing comprehensive input to the Commission in all of these important proceedings without causing an undue delay in the process.

The Commission has often found that a comment pleading cycle extension is warranted when necessary to ensure that 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.¹² Consistent with Commission precedent, a limited 30-day

¹⁰ Signal Boosters Public Notice at 1.

¹¹ *Consumer and Governmental Affairs Bureau Seeks Comment on “Need for Speed” Information for Consumers of Broadband Services*, CG Docket No. 09-158, Public Notice, DA 11-661 (CGB rel. Apr. 11, 2011).

¹² See, e.g., *Empowering Consumers to Avoid Bill Shock*, Order, 25 FCC Rcd 17405 ¶ 3 (CGB 2010) (also recognizing the “multitude of issues” on which the Commission seeks comment); *Wireless E911 Location Accuracy Requirements*, Order, 25 FCC Rcd 16879 ¶ 3 (PSHSB 2010) (granting an extension “to ensure that all interested parties have the time necessary to prepare full and informed comments and reply comments”); *Twenty-One Day Extension of Time to File Reply Comments on Wireless Innovation and Investment Notice of Inquiry*, Public Notice, 24 FCC Rcd 12579, 1-2 (WTB and OET 2009) (finding that granting a limited extension serves the public interest because it “would be beneficial to the development of a complete record on the issues”); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, 24 FCC Rcd 8490, 1 (WTB 2009) (same); *Media Bureau Grants Extension of Time to File Comments and Reply Comments in Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, 23 FCC Rcd 3741, 2 (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

extension of the comment and reply comment deadlines is appropriate to enable affected stakeholders to more thoroughly evaluate the issues raised by the Public Notice and provide more relevant analysis for the Spectrum Task Force. 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,

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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).