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September 1, 2011

**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. On March 30, and again on August 27, 2009, Clearwire requested extensions of six months each. The Commission granted both of those extensions. On February 18, 2010, Clearwire filed an additional request which the Commission granted on March 15, giving Clearwire until September 15, 2010 to complete the Transition. On August 24, Clearwire filed another request which the Commission granted on September 15, giving Clearwire until March 15, 2011 to complete the Transition. On February 22, Clearwire filed an additional request, which the Commission granted on March 17, providing until September 15 for Clearwire to complete the Transition. Clearwire finds that it is still 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



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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.

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. Although Clearwire continues to work towards obtaining the necessary consents, it has been unable to make substantial process.

As Clearwire has previously reported to the Commission, it had been working 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. The second Canadian operator that Clearwire must coordinate with is Craig Wireless, the Canadian operator in the upper half of the BRS/EBS band. Clearwire has continued to try to work with the Canadian operators for a long time now. In that time, we have made little progress, although we are still hopeful. As Clearwire indicated in its last request, it has become clear to Clearwire that a long term consent would be unlikely until Industry Canada finalizes the Canadian 2.5GHz bandplan. Clearwire is hopeful that due to the adoption by Industry Canada on the Canadian 2.5 GHz bandplan, this process may be able to move forward soon. To that end, and since this delay is clearly 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 that are required to be served with this request.

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