

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

In the matter of)
)
Cellco Partnership d/b/a Verizon) WT Docket No. 12-4
Wireless, SpectrumCo, LLC and Cox)
TMI Wireless, LLC)
)

To: Chief, Wireless Telecommunications Bureau

MOTION FOR EXTENSION OF TIME

Public Knowledge (“PK”) and the Rural Telecommunications Group, Inc. (“RTG”) file this Motion for Extension of Time to request the Wireless Telecommunications Bureau (“Wireless Bureau”) to extend the time for parties to respond to the impact in the above captioned proceeding (“VZ/SpectrumCo”) of the proposed transfer of licenses from Cellco Partnership d/b/a Verizon Wireless and T-Mobile License, LLC, WT Docket No. 12-175 (“VZ/T-MO”)¹ by two weeks to July 24, 2012. This will allow parties to respond to any relevant information in Verizon and T-Mobile’s Oppositions to Petitions to Deny, which they will file on July 17, 2012. In addition, this brief delay will relieve the considerable burden on PK, RTG and others of filing two different sets of filings on the same day, at a time when key staff are unavailable due to the July 4th holiday week.² By contrast, the brief extension requested will impose little if any burden on Applicants.

¹ See, “Cellco Partnership d/b/a Verizon Wireless and T-Mobile License, LLC Seek FCC Consent to the Assignment of Advanced Wireless Service Licenses,” WT Docket No. 12-175 (rel. June 26, 2012) (“VZ/T-MO Public Notice”).

² RTG also notes that many of its members are focused on preparing for the upcoming Mobility Fund Phase I Auction (FCC Auction 901) which requires FCC Form 180 to be

ARGUMENT

By public notice dated June 26, 2012, the Wireless Bureau requested comment with regard to whether and how the proposed VZ/T-MO transaction, which is contingent on the Commission approving the VZ/SpectrumCo transaction, should impact analysis of the VZ/SpectrumCo transaction.³ The Notice requested responses by July 10, 2012, and stated that the Wireless Bureau would stop the 180-day voluntary “shot clock” until July 10 as well. In a separate Public Notice issued on the same day, the Wireless Bureau established the pleading cycle for the VZ/T-MO transaction. It provided only two weeks for Petitions to Deny, making any Petitions to Deny in VZ/T-MO also due on July 10, 2012. Oppositions to any Petitions are due July 17, 2012 and Replies to Oppositions due July 24, 2012.

Given the complicated nature of these intertwined transactions, the oppositions Verizon and T-Mobile will file to any Petitions to Deny are likely to be highly relevant to consideration of the impact of the VZ/SpectrumCo transaction. Allowing the parties to see and consider the Verizon and T-Mobile Oppositions before filing replies will allow for more comprehensive comments in this proceeding. It makes little sense to set a deadline for comments on the impact of the VZ/T-Mo transaction on the VZ/SpectrumCo proceeding, then require parties to file these comments while highly relevant information remains outstanding.

filed no later than July 11, 2012 and have not had time to review and analyze the impact of the Verizon/T-Mobile transaction to determine its impact on rural carriers and rural consumers.

³ See, “Wireless Telecommunications Bureau Seeks Comment On The Impact On The Verizon Wireless – SpectrumCo and Verizon Wireless – Cox Transactions of the Applications of Verizon Wireless and T-Mobile To Assign AWS Licenses,” WT Docket No. 12-4 (rel. June 26, 2012).

In addition, the short time frame – which includes the July 4th holiday – places a considerable burden on PK, RTG and other, similarly situated parties. Of the three attorneys cleared to review the confidential information and familiar with the record in VZ/SpectrumCo, one is in San Diego for the Transpacific Partnership negotiation round and the other had left on a long-planned family vacation before the VZ/T-MO transaction was even announced. RTG, as a trade association, must review and analyze the transactions with its members and solicit input in the preparation of its filings and there is not sufficient time given for it to do so, especially with the impending July 4th holiday. PK and RTG believe that other organizations find themselves similarly short-handed as a result of the July 4th holiday.

By contrast, a brief two-week extension will impose no significant burden on the Applicants in VZ/SpectrumCo. Applicants have asserted that their agency agreements require no approval, and they have therefore already begun cross-marketing each other's products. Nor have Applicants indicated that there is any significant due date by which the spectrum transfer must take place. A delay of two weeks will have no significant impact on Verizon's deployment schedule, nor will any party to the transaction incur any kind of penalty or late fee from this brief extension.

CONCLUSION

An extension of two weeks for parties to comment on the impact of the VZ/T-MO transaction will impose no significant burden on the Applicants. By contrast, a two-week extension will allow for more comprehensive comments while providing significant relief to parties such as PK and RTG.

WHEREFORE, the Bureau should grant the requested extension.

Respectfully submitted,

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July 5, 2012

CERTIFICATE OF SERVICE

I, Colleen von Hollen, of Bennet & Bennet, PLLC, hereby certify that a copy of the foregoing Motion for Extension of Time of the Rural Telecommunications Group, Inc. and Public Knowledge was served on this 5th day of July, 2012, via electronic mail, on those listed below:

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