

September 26, 2011

Via Electronic Filing

Aaron Goldschmidt
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Request for Extension of Time for Submittal of Comments on
WT Docket Nos. 08-61 & 03-187; DA 11-1455

Dear Mr. Goldschmidt:

The Conservation Groups (consisting of the American Bird Conservancy, Defenders of Wildlife, and the National Audubon Society) hereby request that the deadline for comments on the Draft Programmatic Environmental Assessment of the Antenna Structure Programs (DPEA) be extended for at least 30 days, preferably 45 days, from October 3, 2011, to and including November 17, 2011.

We anticipate that the new Longcore et al. 2011 study of the impact of communication towers on migratory birds at the species level will be finalized within the next several weeks after peer review is completed. Because that study is so relevant to the issues under review in the DPEA, and because it consists of a meta-analysis (i.e. synthesis) of 73 different scientific studies conducted in both the U.S. and Canada – the most comprehensive and timely review to date where more than 263,800 carcasses of 239 bird species were identified, wildlife biologists and other members of the public should have an opportunity to review the study in its final form and comment on the DPEA in light of that study. Perhaps most troubling is the identification of 54 species of Birds of Conservation Concern (BCC) and 2 Federally endangered birds killed at communication towers in the Longcore et al. review. In addition, the authors of the DPEA should have the opportunity to review that study once it is final and reconsider the findings and conclusions for the final PEA. The PEA should be based on the most up-to-date scientific literature and current population information. Without the new Longcore et al. 2011 study, and additional new findings, the PEA will be scientifically flawed.

We are also requesting this extension so that we will have sufficient time for additional experts whom we have consulted to review the DPEA and the presentation at the public meeting on September 20, and for us to incorporate their analysis into our comments.

At the meeting on September 20, we initially requested an extension of 30 days, and the U.S. Fish and Wildlife Service representatives requested an extension of at least one month. In light of FWS request and the lack of a date certain for publication of the Longcore et al. 2011 study, we are now requesting a 45-day extension.

We believe that this extension will enable us and other members of the public to respond fully to the DPEA and not cause any significant delay in the regulatory process. We understand

that the target for a final PEA is the end of the year. Even if this extension causes that deadline to slip, there is a greater benefit to the Commission of ensuring that the scientific record for the PEA is complete, and the integrity of the scientific information is the best available and the most timely, which will ultimately allow the Commission to receive comprehensive, constructive comments.

Respectfully submitted,

/s/ Greer S. Goldman

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