

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Revision of Part 15 of the Commission’s Rules) ET Docket No. 13-49
to Permit Unlicensed National Information)
Infrastructure (U-NII) Devices in the 5 GHz Band)

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46 of the Commission’s rules,^{1/} Wi-Fi Alliance hereby requests a 30-day extension of time of the deadline for submitting reply comments in the above-captioned proceeding.^{2/} Wi-Fi Alliance recognizes that it is not the Commission’s policy to routinely grant extensions of time in rulemaking proceedings.^{3/} In this case, however, a 30-day extension of the reply comment period is warranted in order to facilitate thorough consideration of the important issues raised and will not cause undue delay of the proceeding.

The extension requested here is in the public interest because it will afford interested parties the time necessary to address the complicated technical and policy questions raised in the NPRM and by commenters in this proceeding. The NPRM seeks comment on whether the Commission should modify its rules governing the existing U-NII bands, whether it should expand unlicensed use to other parts of the 5 GHz band and if so, the impact of that use on incumbent operations. Nearly 50 comments were filed in response to the NPRM. As IEEE 802 stated in its Request for Extension of Reply Comment Deadline, the current deadline allocates an

^{1/} 47 C.F.R. § 1.46.

^{2/} See *Revision of Part 15 of the Commission’s Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band*, Notice of Proposed Rulemaking, 28 FCC Rcd 1769 (2013) (“NPRM”). The current deadline for submitting reply comments is June 24.

^{3/} See 47 C.F.R. § 1.46(a).

insufficient amount of time to thoroughly review the record and develop responses.^{4/} An extension of the deadline will afford parties the time necessary to analyze and respond to the lengthy and numerous comments filed. Moreover, significant stakeholders in this proceeding – including Wi-Fi Alliance and IEEE 802 – have scheduled meetings immediately after the current reply comment deadline at which members will consider the issues raised in the initial comments.^{5/} The reply comments of those stakeholders will be better informed by the discussion of the matters raised in the NPRM and of the comments of other parties at their upcoming meetings.

Accordingly, Wi-Fi Alliance respectfully requests a 30-day extension of the deadline for filing reply comments in response to the NPRM.^{6/}

Respectfully submitted,

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^{4/} See IEEE 802 Request for Extension of Reply Comment Deadline, ET Docket No. 13-49 (filed June 4, 2013).

^{5/} The Wi-Fi Alliance Member Meeting will be held from June 25-27, and IEEE 802's Plenary Session will take place July 14-19.

^{6/} Thirty days from the current reply comment deadline is July 24, 2013.