

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

In the Matter of)	
)	
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission’s Rules to Improve Wireless Coverage Through the Use of Signal Boosters)	WT Docket No. 10-4
)	
Wireless Telecommunications Bureau Seeks Comment on ClearRF Request for Determination of Equivalent Protection)	DA 14-304
)	

**CTIA – THE WIRELESS ASSOCIATION® REQUEST FOR EXTENSION OF
COMMENT AND REPLY COMMENT DEADLINES**

CTIA – The Wireless Association® (“CTIA”) respectfully requests an extension of the comment and reply comment deadlines in the above-captioned proceeding, currently set for March 20, 2014 and March 27, 2014.¹ Pursuant to Section 1.46 of the Commission’s rules, CTIA requests that these deadlines be extended by 7 days such that comments are due no later than March 27, 2014 and reply comments are due no later than April 3, 2014.² A short-term extension is in the public interest to allow interested parties to meaningfully address the technical issues implicated by this proceeding.

CTIA seeks an extension of time to allow for a technical evaluation of ClearRF’s claims that its direct connect consumer signal booster, ClearRF Model Number WRE2710 (“ClearRF Booster”), provides equivalent protections to the Commission’s Network Protection Standard even though it does not meet the technical standards set forth in Sections 20.21(e)(8)(i)(B) and

¹ *Wireless Telecommunications Bureau Seeks Comment on ClearRF Request for Determination of Equivalent Protection*, WT Docket No. 10-4, Public Notice, DA 14-304 (Rel. Mar. 5, 2014) (“*ClearRF Notice*”).

² 47 C.F.R. § 1.46.

20.21(e)(8)(i)(C)(2)(iii) of the Commission’s rules.³ As the Commission noted in the *ClearRF Notice*, consumer signal boosters that do not meet the technical parameters delineated in Sections 20.21(e)(1)-(9) of its rules may still satisfy the Network Protection Standard if the manufacturer can demonstrate that the booster provides equivalent protections.⁴ Given the technical complexity of the Network Protection Standard, however, determining whether a consumer signal booster provides equivalent protections is necessarily a time-consuming inquiry that requires complex analyses by technical experts.

Extending the deadline for comments and reply comments will provide parties with the time necessary to conduct critical interference and other technological analyses. Only with such analyses will interested stakeholders have the opportunity to fully evaluate whether the ClearRF Booster complies with the Commission’s signal booster standards and “does not result in degraded performance on . . . wireless networks.”⁵ Further, the extension of time will help enhance the development of a more thorough record in this proceeding and ensure that the Commission’s goal of protecting wireless networks from harmful interference for the benefit of wireless consumers is preserved.

CTIA recognizes that requests to extend filing deadlines are not routinely granted, but the Commission has often found that a pleading cycle extension is warranted when necessary to ensure that the Commission receives full and informed responses and that affected parties have a

³ Letter from Shawn Taylor, Chief Operating Officer, ClearRF LLC, to Roger Noel, Chief, Mobility Division, Wireless Telecommunications Bureau, Federal Communications Commission (Feb. 26, 2014) (“ClearRF Equivalent Protection Request”).

⁴ *ClearRF Notice* at 1 (citing *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission’s Rules to Improve Wireless Coverage Through Use of Signal Boosters*, Report and Order, 22 FCC Rcd 1663, ¶¶ 75-76 (2013) (“*Signal Booster Order*”).

⁵ *Signal Booster Order*, ¶ 2.

meaningful opportunity to develop a complete record for the Commission’s consideration.⁶ Moreover, the Commission has recognized that extensions of time may be particularly warranted when complex, technical issues are raised in a proceeding.⁷ Indeed, the Commission has even acknowledged that the signal booster proceeding involves “complex technical issues” that have previously warranted granting an extension of comment cycles.⁸ Under these circumstances, CTIA believes that the proposed extension of time is appropriate so that interested stakeholders are given the time needed to carefully study the technical underpinnings of ClearRF’s request for a determination of equivalent protection. Granting a short-term extension to evaluate these complex issues will, in turn, yield a more robust record for the Commission’s review.

⁶ See, e.g., *In the Matter of Comprehensive Review of Licensing and Operating Rules for Satellite Services*, Order, 27 FCC Rcd 15872, 15872 ¶¶ 2-4 (2012) (granting an extension of time to file comments where the proceeding involved “multiple and highly technical 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, 8491 (2009) (permitting 14-day extension to allow for “development of a complete record on the issues”).

⁷ See, e.g., *Wireless Telecommunications Bureau Extends Period to File Reply Comments on Proposed Rules to Expand Access to Mobile Wireless Services Onboard Aircraft*, Public Notice, WT Docket No. 13-301 (Rel. Mar. 10, 2014) (agreeing that an extension of time was warranted to ensure that the Commission obtained a complete and thorough technical record in response to a Notice of Proposed Rulemaking); *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, Order, 28 FCC Rcd 11134, 11135 ¶ 3 (2013) (concluding that an extension would enable parties “sufficient time to prepare reply comments that fully respond to the complex technical and policy issues raised in the *Notice*”).

⁸ *Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 if the Commission’s Rules to Improve Wireless Coverage Through the Use of Signal Boosters*, Order 26 FCC Rcd 8578, 8578 ¶ 3 (2011) (explaining that “providing a limited extension will serve the public interest by allowing the parties to discuss the complex technical issues at stake”).

For the foregoing reasons, the public interest is served by the requested 7-day extension of the comment and reply comment deadlines in the above-captioned proceeding to March 27, 2014 and April 3, 2014.

Respectfully submitted,

CTIA – THE WIRELESS ASSOCIATION®

By: /s/ Brian M. Josef

Brian M. Josef
Assistant Vice President, Regulatory Affairs

Michael F. Altschul
Senior Vice President and General Counsel

Scott K. Bergmann
Vice President, Regulatory Affairs

CTIA – The Wireless Association®
Expanding the Wireless Frontier
1400 16th Street, N.W., Suite 600
Washington, D.C. 20036
(202) 785-0081
www.ctia.org

March 18, 2014