



CTIA recognizes that requests to extend filing deadlines are not routinely granted, but the Commission often has 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 meaningful opportunity to develop a complete record for the Commission’s consideration.<sup>2</sup> A 30-day extension in this case will enable affected stakeholders to more thoroughly evaluate the initial comments and, in turn, provide more substantive information in the reply comment cycle. No parties will be prejudiced by such an extension.

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<sup>2</sup> See, e.g., *Promoting Technological Solutions to Combat Contraband Wireless Device Use in Correctional Facilities*, Order, 28 FCC Rcd 11134, 11135 ¶ 3 (PSHSB, WTB 2013) (finding 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*”); *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*, Order, 26 FCC Rcd 8578, ¶ 3 (WTB 2011) (concluding that “providing a limited extension will serve the public interest by allowing the parties to discuss the complex technical issues at stake”); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003).

For the foregoing reasons, CTIA requests a 30-day extension of the reply comment deadline in this proceeding, to July 14, 2014.

Respectfully submitted,

CTIA – THE WIRELESS ASSOCIATION®

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