

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

In the Matter of )  
 )  
Amendment of the Commission’s Rules with ) GN Docket No. 12-354  
Regard to Commercial Operations in the )  
3550-3650 MHz Band )

**MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS**

The Satellite Industry Association (“SIA”), pursuant to Section 1.46 of the Commission’s rules, hereby requests a two-week extension of time for parties to file reply comments in response to the Commission’s Further Notice of Proposed Rulemaking in the above-captioned proceeding.<sup>1</sup> Pursuant to the schedule established in the Notice, comments were due on July 14, 2014, and reply comments are scheduled to be filed on August 1, 2014. SIA seeks extension of the reply date to August 15, 2014, to permit a more fully developed record in this proceeding.

SIA recognizes that the Commission does not routinely grant extensions of time,<sup>2</sup> but there is good cause to do so in this instance. More than sixty parties submitted comments in response to the Notice. Some of these filings were quite lengthy and included technical analysis of the issues in the proceeding, including matters relating to the protection of satellite earth station operations that are of particular concern to SIA. Reviewing all of these documents and drafting responsive comments will be time consuming for SIA and other parties.

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<sup>1</sup> *Amendment of the Commission’s Rules with Regard to Commercial Operations in the 3550-3650 MHz Band*, Further Notice of Proposed Rulemaking and Order, GN Docket No. 12-354, FCC 14-49 (rel. Apr. 23, 2014) (“Notice”).

<sup>2</sup> 47 C.F.R. § 1.46(a).

In addition, during the scheduled reply comment period, many of the technical personnel for SIA member companies who are responsible for analyzing the issues raised in the Notice will be unavailable. These personnel will be attending meetings of ITU Joint Task Groups preparing for WRC-15 that are occurring in Geneva July 21 through July 31, 2014. The absence of these personnel during a substantial portion of the reply comment period will make it extremely difficult for SIA to meaningfully respond to comments under the current schedule.

The requested extension will provide additional time needed for SIA and other interested parties to respond to the significant issues raised in other comments and will allow the Commission to develop a more complete record on the important spectrum usage issues in the Notice. Moreover, the brief two-week extension will not prejudice the Commission or any interested parties, as it is unlikely to delay the proceeding in any meaningful way.

For the foregoing reasons, SIA requests a two-week extension of time for all parties to file reply comments in this proceeding.

Respectfully submitted,

**SATELLITE INDUSTRY ASSOCIATION**

By: 

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