

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

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

To: The Commission

**ASSOCIATION OF GLOBAL AUTOMAKERS, INC.
REQUEST FOR EXTENSION OF REPLY TO OPPOSITION
TO PETITION FOR RECONSIDERATION DEADLINE**

Pursuant to Section 1.46 of the Federal Communication Commission’s (“FCC’s” or “Commission’s”) rules, the Association of Global Automakers, Inc. (“Global”) respectfully requests a brief eight-day extension of the Reply to Opposition to Petition for Reconsideration deadline in response to the *First Report and Order* (“*Order*”) in the above-captioned proceeding, to September 2, 2014. Pursuant to the FCC’s Public Notice number 3004, dated July 14, 2014, Replies to Oppositions are currently due on August 25, 2014.¹ As further discussed below, a brief extension of time in this matter serves the public interest to allow interested parties the time necessary to meaningfully address the issues raised by the *Order*, Petitions for Reconsideration, and Oppositions to those petitions.

The *Order*, in part, increases the upper edge of the U-NII-3 band to 5.85 GHz, bringing it immediately adjacent to the 5.9 GHz reserved by the FCC for the development of DSRC technologies. Global has stated in its Petition for Partial Reconsideration that

¹ Public Notice was published in the Federal Register on July 30, 2014. 70 Fed. Reg. 44150.

this extension of the U-NII-3 band will allow additional unlicensed operation of high-powered U-NII devices in 5 GHz bands adjacent to ITS, which will cause harmful interference to Intelligent Transportation Systems (“ITS”) and Dedicated Short Range Communications Service (“DSRC”) “safety-of-life” operations. The oppositions to Global’s Petition for Partial Reconsideration raised complex issues regarding the nature and potential negative outcome of the *Order’s* expansion of the U-NII-3 band under 47 C.F.R. § 15.407. Extending the deadline for reply to oppositions would provide parties with additional time to evaluate the record regarding various technologies and the proposed rules and to prepare submissions enabling the Commission to make a decision based on a fully developed record.

Global 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.² A brief eight-day extension in this proceeding will enable interested parties to more thoroughly examine the pleadings and provide more

² 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).

substantive information in the reply cycle. No parties will be prejudiced by such an extension.

For the foregoing reasons, Global requests an eight-day extension of the reply comment deadline in this proceeding, to September 2, 2014.

Respectfully submitted,

ASSOCIATION OF
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By: _____

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CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of August, 2014, a true and correct copy of the foregoing Request was served by mail service³ on the following:

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