

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

In the Matter of )  
 )  
Expanding Access to Mobile Wireless Services ) WT Docket No. 13-301  
Onboard Aircraft )

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

CTIA–The Wireless Association® (“CTIA”) respectfully requests an extension of the reply comment deadline in response to the Notice of Proposed Rulemaking in the above-captioned proceeding, which currently is set for March 17, 2014.<sup>1</sup> Pursuant to Section 1.46 of the Commission’s rules,<sup>2</sup> CTIA requests that this deadline be extended by 60 days to May 16, 2014. As further discussed below, a limited extension in this instance serves the public interest by providing interested parties the time necessary to meaningfully address the complicated technological, engineering, and policy issues raised by the *Notice* and the initial comments, and to prepare submissions enabling the Commission to make an informed decision based on a fully developed record.

The *Notice* raises a number of highly technical issues and cited various interference studies involving in-flight wireless connectivity and the use of licensed commercial mobile spectrum. It relies on European studies to tentatively conclude that Airborne Access Systems can provide in-flight wireless connectivity using licensed commercial mobile spectrum across the United States without interference—but these studies did not analyze U.S. mobile spectrum

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<sup>1</sup> *Expanding Access to Mobile Wireless Services Onboard Aircraft*, Notice of Proposed Rulemaking, 28 FCC Rcd 17132 (2013) (“*Notice*”).

<sup>2</sup> 47 C.F.R. § 1.46.

bands or all of the air interfaces used across the U.S. bands. In addition to the European studies, several commenters provided technical showings regarding operations in the United States.<sup>3</sup>

CTIA commends the Commission for asking important questions that consider how the European and U.S. circumstances may pose differing interference paradigms.<sup>4</sup> As one initial commenter observed, “the Commission should exercise all due care as it evaluates the interference environment for mobile communications services.”<sup>5</sup>

These technical matters, however, are highly complex and require close study by interested stakeholders and the Commission. CTIA already has reached out to proponents of the Airborne Access Systems approach to engage in joint discussions on some of these technical issues. Extending the deadline for reply comments will provide parties with additional time to conduct much needed interference and other technological analyses, consider other existing studies beyond those discussed in the *Notice*, and follow up on questions and issues sparked by commenters who discussed the inflight systems that have been deployed abroad.

Further, nearly 20 parties filed substantive initial comments in response to the *Notice* representing a cross section of industry and consumer stakeholders. In addition, the Commission received more than 1200 “brief” comments from consumers, highlighting the intense importance to consumers of reaching an appropriate outcome in this proceeding. The Commission should strive to ensure that the record contains a meaningful opportunity to contribute input into this highly watched rulemaking.

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<sup>3</sup> See, e.g., Comments of Aeromobile Communications Limited, Appendix (“Technical Review of Frequency Bands for AAS Operations in U.S. Airspace”); Comments of OnAir S.A.; Comments of Carnegie Technologies.

<sup>4</sup> See *Notice*, 28 FCC Rcd at 17146 ¶ 33 & 17147 ¶ 36.

<sup>5</sup> Comments of the Consumer Electronics Association at 5.

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>6</sup> A 60-day extension in this case will enable affected stakeholders – industry and consumer groups alike – to more thoroughly evaluate the initial comments and, in turn, provide more substantive information in the reply comment cycle. Indeed, CTIA believes that additional time would ultimately expedite matters in this case, leading to concrete data and proposals regarding in-flight wireless connectivity. No parties will be prejudiced by such an extension, and the additional time will provide the Commission with a more robust and meaningful record.

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<sup>6</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 60-day extension of the reply comment deadline in this proceeding, to May 16, 2014.

Respectfully submitted,

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