

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

In the Matter of)	
)	
Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002)	AU Docket No. 14-252 GN Docket No. 12-268

**JOINT REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT
DEADLINES**

The Consumer Electronics Association, CTIA – The Wireless Association®, and the Telecommunications Industry Association (collectively, “Petitioners”), hereby respectfully submit this request for a 30 day extension of the comment and reply comment deadlines in the above-captioned proceeding. In a Public Notice, the Commission seeks comment on detailed procedures for the upcoming broadcast television incentive auction.¹ The comment and reply comment deadlines are currently set for January 30, 2015 and February 27, 2015.² The Petitioners hereby request that comments be due no later than March 2, 2015 and that reply comments be due no later than March 30, 2015. A 30 day extension is in the public interest to allow subject matter experts at interested companies to examine the novel issues raised by this auction and to develop a meaningful record in this proceeding. Further, there are numerous incentive auction-related comment deadlines in January and February, and an extension of time will permit interested parties to dedicate the resources necessary to drafting fulsome comments in response to the Public Notice. Meanwhile, grant of the requested extension should not cause the incentive auction itself to be delayed.

¹ *Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002*, Public Notice, FCC 14-191 (Dec. 17, 2014).

² *Id.*

Petitioners seek an extension of time to allow interested parties' auction experts to analyze the Public Notice and prepare thorough responses to the Public Notice. As of today, Auction 97 – the Commission's AWS-3 spectrum auction – is still ongoing. Several potential incentive auction bidders are also bidders in Auction 97. Key personnel for these companies are currently sequestered and may be unavailable to assist with comments and/or reply comments until bidding is complete. Further, once bidding concludes Section 1.2105(c)'s prohibition on certain communications will not end for another ten business days.³ For industry associations such as Petitioners, their Auction 97 bidder members will not be able to openly discuss potential comments and/or reply comments until the auction "quiet period" has ended. The requested extension will permit individual Auction 97 bidders to fully dedicate the resources of their auction experts to comments filed in this proceeding, and it will also permit industry associations such as Petitioners to engage in greater discussion with their member companies regarding comments and reply comments. And, to the extent there are key "lessons learned" from Auction 97 that inform the broadcast television incentive auction, comments and reply comments will be able to discuss these matters.

Further, the comment deadlines in response to the Public Notice are among several incentive auction-related deadlines in January and February 2015. The Commission has sought comment on issues related to low power television (comments and replies due January 12, 2015 and January 26, 2015),⁴ interservice interference (comments and replies due January 21, 2015

³ *Auction of Advanced Wireless Services (AWS-3) Licenses Scheduled for November 13, 2014, Notice and Filing Requirements, Reserve Prices, Minimum Opening Bids, Upfront Payments, and Other Procedures for Auction 97*, Public Notice, DA 14-1018, ¶¶ 18, 228 (July 23, 2014).

⁴ *Amendment of Parts 73 and 74 of the Commission's Rules to Establish Rules for Digital Low Power Television and Television Translator Stations*, Order, DA 14-1727 (MB Dec. 1, 2014).

and February 5, 2015),⁵ designated entity issues (comments and replies due January 23, 2015 and February 12, 2015),⁶ and wireless microphones/unlicensed operation (comments and replies due February 4, 2015 and February 25, 2015).⁷ These proceedings all require the attention of many of the same personnel within each individual commenting party. By granting the requested 30 day extension, the Commission will enable interested parties to more thoroughly examine the complex issues in the Public Notice and dedicate the resources needed to develop a more robust record.

Petitioners recognize that requests to extend filing deadlines are not routinely granted, but the Commission has previously concluded that an extension is warranted when such an extension is necessary to ensure that the Commission receives full and informed responses and that affected parties are given a meaningful opportunity to develop a complete record for the Commission's consideration.⁸ In the case of the Public Notice, the Commission is asking

⁵ *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions*, Further Notice of Proposed Rulemaking, 79 Fed. Reg. 76282 (Dec. 23, 2014).

⁶ *Updating Part 1 Competitive Bidding Rules*, Order, DA 14-1784 (WTB Dec. 8, 2014).

⁷ *Amendment of Part 15 of the Commission's Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and Amendment of Part 74 of the Commission's Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap*, Order, DA 14-1801 (OET Dec. 10, 2014).

⁸ *See, e.g., Wireless Telecommunications Bureau and Office of Engineering and Technology Extend Period to File Comments and Reply Comments in Response to Notice of Inquiry on Use of Spectrum Bands Above 24 GHz for Mobile Radio Services*, Public Notice, DA 14-1703 (WTB/OET 2014) (stating that "we agree that an extension of time to file comments and reply comments is warranted to ensure that the Commission obtains a complete and thorough record . . ."); *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419 (WTB rel. June 24, 2009) (granting 14-day extension in order for "development of a complete record on the issues"); *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) ("we agree that an

complicated questions about a novel auction process. Petitioners believe that the proposed extension of time is appropriate and will enable interested parties to provide detailed input on the important issues raised by the Public Notice. Petitioners do not expect that the requested extension will cause the incentive auction itself to be delayed, as the Commission will have sufficient time to resolve issues raised in the Public Notice docket prior to the currently-scheduled auction date.⁹ For these reasons, a 30 day extension of comment and reply comment deadlines in this proceeding is in the public interest.

extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto”).

⁹ The Commission has stated that it expects to accept applications for the auction in the fall of 2015 and hold the auction in early 2016. *See* Gary Epstein, “Incentive Auction Progress Report” (Oct. 24, 2014), *at* <http://www.fcc.gov/blog/incentive-auction-progress-report>.

For the foregoing reasons, an extension of time will help ensure the development and submission of a more thorough and meaningful record for the Commission to consider.

Respectfully submitted,

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Date: December 23, 2014