

BEFORE THE

ORIGINAL

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

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Allocation and Designation of Spectrum for)
 Fixed-Satellite Services in the 37.5-38.5 GHz,)
 40.5-41.5 GHz, and 48.2-50.2 GHz Frequency)
 Bands; Allocation of Spectrum to Upgrade)
 Fixed and Mobile Allocations in the)
 40.5-42.5 GHz Frequency Band; Allocation of)
 Spectrum in the 46.9-47.0 GHz Frequency)
 Band for Wireless Services; and Allocation of)
 Spectrum in the 37.0-38.0 GHz and)
 40.0-40.5 GHz for Government Operations)

IB Docket No. 97-95

RM-8811

To The Commission:

REQUEST FOR EXTENSION OF REPLY COMMENT DEADLINE

Lockheed Martin Corporation hereby requests extension of the deadline for filing reply comments in the above-captioned proceeding, in which initial comments are due today. The Commission's NPRM in this docket advances a comprehensive spectrum plan for the 36 - 51.4 GHz bands, which includes proposals to allocate frequencies to services in portions of the spectrum that are not in accord with the current International Table of Frequency Allocations. The modifications proposed raise many complex issues, which under any circumstances would be difficult to address fully within the two-week reply period ending May 19, 1997. Both current ITU activities and the likelihood that numerous comments will be filed by interested parties with varied interests in these bands, however, provide strong justification for allowing additional time in order to create the most complete and useful record. Accordingly, Lockheed Martin respectfully requests, for the reasons set forth herein, that the reply deadline be extended by thirty (30) days, until June 18, 1997.

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possible counterproposals to the initial comments, within the two-week timeframe. The fact that the CPM intervenes during the same period complicates this task even more.

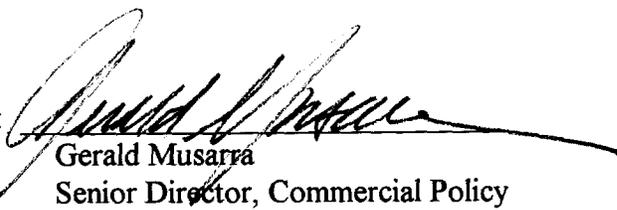
In light of these circumstances, Lockheed Martin believes that it is appropriate for the Commission to extend the May 19, 1997 reply deadline. An extension will serve the public interest by enhancing the quality of the record assembled in this proceeding. By giving all interested parties an adequate opportunity to review the opinions expressed by each of the other parties and to absorb the results of the CPM, the Commission will have the benefit of more comprehensive and informative reply comments.

Accordingly, for the reasons set forth herein, Lockheed Martin respectfully requests that the Commission extend the deadline by which reply comments must be filed in IB Docket No. 97-95 for a period of thirty days, until June 18, 1997.

Respectfully submitted,

LOCKHEED MARTIN CORPORATION

By:


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May 5, 1997

The first and most significant factor supporting an extension of the reply deadline is the fact that today marks the opening of the ITU Conference Preparatory Meeting ("CPM") in Geneva, which is intended to refine spectrum allocation and other issues to be considered this Fall at the 1997 World Radiocommunication Conference ("WRC"). Because the Commission's NPRM includes proposals to make changes in the International Table of Frequency Allocations and would thus ultimately require WRC action to amend the Table, the CPM can be expected to produce new information concerning the potential for international acceptance of the Commission's plan or possible alternatives. Because the CPM does not conclude until May 16, 1997, the last business day before the current reply deadline, it would be impossible for parties commenting in this proceeding to assimilate all of the developments at the CPM and provide useful input to the Commission within the current timeframe.

Moreover, many of those in the best position to address the issues raised by initial commenters will in fact be in attendance at the CPM, limiting their ability to review and respond to the issues raised by other parties filing comments today. Because the bands encompassed within the 36 - 51.4 GHz range include allocations for all types of satellite services, as well as fixed and mobile terrestrial services, and various government and scientific uses, the number of interested parties submitting comments can be expected to be quite large. Even under ordinary circumstances, it would be a daunting task to digest all of the various issues, as well as to develop