

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
)	
Revision of Part 15 of the)	ET Docket No. 98-153
Commission's Rules Regarding)	
Ultra-Wideband Transmission)	
Systems)	
)	

MOTION FOR EXTENSION OF TIME

Motorola, Inc. ("Motorola") respectfully requests an extension of time until November 21, 2000, in which to submit its reply to the comments filed on September 12, 2000 in response to the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.¹

More than 100 parties commented in response to the *NPRM*, with many offering complex and detailed technical analyses on many of the issues raised by the Commission. The very volume of pleadings speaks to the intense interest that the *NPRM* has generated, with the complexity of many of the comments requiring significantly more time to evaluate and assess than the currently allotted 30 days will allow. Indeed, a number of original, major studies have been presented in these comments that warrant careful examination and consideration.

The Commission afforded interested parties 90 days from the Federal Register publication date of the *NPRM* to file comments. Motorola believes it is reasonable, in view of the exceptional volume and complexity of the comments filed to

¹ See *In the Matter of Part 15 of the Commission's Rules Regarding Ultra-Wideband Transmission Systems*, ET Docket No. 98-153, Notice of Proposed Rulemaking, 65 Fed. Reg. 37332 (June 14, 2000) ("*NPRM*").

date, that at least 70 days be allotted to file replies. Moreover, in light of the Commission's stated intention to allow for further comments once interference test data are submitted into the record of this proceeding,² the requested extension of time should not delay any Commission action. Accordingly, Motorola respectfully requests that the Commission extend the filing period for replies in this proceeding until November 21, 2000.³

Respectfully submitted,

By: _____
Richard C. Barth
Vice President and Director
Telecommunications Strategy
and Regulation
Motorola, Inc.
1350 I Street, NW
Washington, DC 20005

By: _____
Leigh M. Chinitz
Assistant Director
Telecommunications Strategy
and Spectrum
Motorola, Inc.
1350 I Street, NW
Washington, DC 20005

September 20, 2000

² *NPRM* at ¶ 7.

³ Motorola notes that the Commission recently denied a last-minute request for an extension of time, until March and April, for comments and replies, respectively, in this proceeding. That request, however, was predicated on the need to evaluate technical tests that NTIA is conducting; the subject request is based on the parties' need to evaluate a massive set of technical submissions and provide the Commission with a complete and meaningful record. *See Order Denying an Extension of Time to File Comment in WT Docket No. 98-153, DA 00-2095, released September 13, 2000.*