

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

In the Matter of	)	
	)	
Flexibility for Delivery	)	IB Docket No. 01-185
Of Communications by	)	
Mobile Satellite Service Providers	)	
In the 2 GHz Band, the L-Band, and the	)	
1.6/2.4 GHz Band	)	
	)	
Amendment of Section 2.106 of the Commission's	)	ET Docket No. 95-18
Rules to Allocate Spectrum at 2 GHz for Use	)	
By the Mobile-Satellite Service	)	

**REQUEST FOR EXTENSION OF TIME**

The Cellular Telecommunications & Internet Association (“CTIA”)<sup>1/</sup> respectfully requests an extension of time – from March 15, 2002 to May 1, 2002 – to submit comments in response to the March 6<sup>th</sup> Public Notice.<sup>2/</sup>

The spectrum management issues raised in this docket remain of critical importance to CTIA’s members and the public. The short turn-around between the release of the Public Notice and the comment deadline, only nine days, makes it impossible for CTIA’s members to devote the necessary time, expert personnel, and

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<sup>1/</sup> CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers and manufacturers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

<sup>2/</sup> See *Commission Staff Invites Technical Comments on the Certain Proposals to Permit Flexibility in the Delivery of Communications by Mobile Satellite Service Providers in the 2 GHz Band, the L-Band, and 1.6/2.4 GHz Band*, IB Docket No. 01-185, DA 02-554 (rel. March 6, 2002).

resources required to prepare comments that would assist the Commission in this proceeding.

The issues identified in the Public Notice are limited only in the sense they are a subset of the issues raised in the NPRM. In fact, the Public Notice seeks comment on the technical issues that are critical to the Commission's understanding and resolution of the two proposals advanced by MSS operators seeking authority to provide terrestrial service. CTIA and its members require more than the nine days set forth in the Public Notice to address the specific technical questions raised by that the Commission.

A grant of this request would be in the public interest because it would give commenters sufficient time in which to address the important technical issues raised in the rulemaking proceeding and would provide the Commission with a more complete record on which to base its decision. Furthermore, grant of this request will not prejudice any other party because MSS applicants already have received their licenses and may begin offering satellite services at any time they choose.

Respectfully submitted,

/s/ \_\_\_\_\_

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