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

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In the Matter of	)	
Improving Public Safety Communications in the 800 MHz Band	)	
	)	WT Docket No. 02-55
Consolidating the 900 MHz Industrial/Land Transportation and Business Pool Channels	)	

To: The Commission

OPPOSITION TO REQUEST FOR EXTENSION OF TIME
OR IN THE ALTERNATIVE
PETITION FOR RECONSIDERATION

Gilcomm, LLC (Gilcomm), by its attorney, hereby files its Opposition to the Request for Extension of Time filed on June 25, 2002, by Association of Public-Safety Communications Officials-International, Inc.; the International Association of Chiefs of Police; the International Association of Fire Chiefs, Inc. and International Municipal Signal Association; the Major Cities Chiefs Association; the Major County Sheriffs' Association; the National Sheriffs' Association; Aeronautical Radio, Inc.; Association of American Railroads; the Forest Industries Telecommunications; the Industrial Telecommunications Association, Inc.; MRFAC, Inc.; the National Association of Manufacturers; the Personal Communications Industry Association; Small Business in Telecommunications; the Taxicab, Limousine and Paratransit Association; and Nextel Communications, Inc. (collectively, the Requestors). In the alternative, in the event that the Commission has acted to extend the period for filing reply comments without providing interested persons with a full opportunity to file an opposition to the Requestors' request, Gilcomm requests that the Commission reconsider its action. In support of its position, Gilcomm shows the following.

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Gilcomm is not opposed to the Commission's providing the Requestors with a full opportunity to form and present a consensus position. Gilcomm is opposed to the Commission's extending the time for the filing of reply comments to allow the Requestors' proposed filing to be submitted as reply comments. Rather, the Commission should reopen the proceeding to the filing of additional initial comments and receive Requestors' filing as initial comments. Then, the Commission should provide a full opportunity for reply to all initial comments.

Gilcomm has invested substantial effort in reviewing the comments, letters, and notices filed in the above captioned proceeding. Gilcomm intends to file reply comments, but were the Commission to accept the Requestors' filing as reply comments at the close of an extended period for filing reply comments, Gilcomm would be unfairly deprived of an opportunity to reply to those comments. Gilcomm could well be placed in the position of filing reply comments in reply to initial comments from which one or more of the Requestors may recede. Gilcomm and all other interested persons would not be able to reply to the position which is most likely to receive favorable Commission consideration.

Hundreds of comments have been filed in this proceeding. Gilcomm appreciates the desirability of the industry's presenting a consensus position, but Gilcomm also appreciates the necessity of the Commission's having a complete record, including the reply comments of Gilcomm and all other interested persons on any new consensus proposal which the Requestors may make. The Requestors' consensus plan will clearly be a new thing, superceding some initial comments and the Commission should have the benefit of reply comment on it. Foreclosing

Gilcomm and others from replying to such a new proposal would not be fair to Gilcomm, to the Commission, or the public interest.

Conclusion

For all the foregoing reasons, Gilcomm respectfully requests that the Commission deny the Requestors' request, and, instead, re-open the proceeding to the filing of new initial comments thirty days hence and extend the filing date for reply comments to a date thirty days thereafter. If the Commission has acted without providing interested persons a full period of time within which to file oppositions before acting, then Gilcomm requests that the Commission reconsider its action to provide for a full exploration of the issues.

Respectfully submitted,
GILCOMM, LLC

Dennis C. Brown

126/B North Bedford Street
Arlington, Virginia 22201
703/525-9630

Dated: June 28, 2002

CERTIFICATE OF SERVICE

I hereby certify that on this twenty-eighth day of June, 2002, I served a copy of the foregoing Opposition to Request for Extension of Time or in the Alternative Petition for Reconsideration on each of the following persons by placing a copy in the United States Mail, first class postage prepaid:

Kris E. Hutchinson
Senior Director, Frequency Management
Aeronautical Radio, Inc.
2551 Riva Road
Annapolis, Maryland 21401-7465

Dennis J. Starks
Senior Commerce Counsel,
Law, Regulatory & Legislative Affairs
Association of American Railroads
50 F Street, N.W.
Washington, DC 20001

Robert M. Gurss, Esq.
Shook, Hardy & Bacon, LLP
600 14th Street, NW, Suite 800
Washington, DC 20005

Kenton E. Sturdevant
Executive Vice President
Forest Industries Telecommunications
871 Country Club Road, Suite A
Eugene, Oregon 97401

Laura L. Smith, President, CEO
Industrial Telecommunications
Association, Inc.
1110 North Glebe Road, Suite 500
Arlington, Virginia 22201-5720

William B. Berger, President
International Association of
Chiefs of Police
515 N. Washington Street
Alexandria, Virginia 22314-2357

Martin W. Bercovici, Esq.
Keller & Heckman, LLP
1001 G Street, NW, Suite 500 W
Washington, DC 20001

Jerry Keller, President
Major Cities Chiefs Association
c/o Las Vegas Metro Police Department
400 Stewart Street
Las Vegas, Nevada 89101

Major County Sheriffs' Association
c/o Orange County Sheriff's Association
2400 West 33rd Street
Orlando, Florida 32839

Clyde Morrow, President
MRFAC, Inc.
899-A Harrison Street SE
Leesburg, Virginia 20175

Lawrence A. Fineran, Vice President
Regulatory and Competition Policy
National Association of Manufacturers
1331 Pennsylvania Avenue, NW
Washington, DC 20004-1790

John Cary Bittick, President
National Sheriffs' Association
1450 Duke Street
Alexandria, Virginia 22314-3490

Robert S. Foosaner
Senior Vice President and
Chief Regulatory Officer
Nextel Communications, Inc.
2001 Edmund Halley Drive
Reston, Virginia 20191

Jay Kitchen, President and CEO
Personal Communications Industry Association
500 Montgomery Street
Alexandria, Virginia 22314-1561

Lonnie Danchik, Chairman
Small Business in Telecommunications
11550 Plano Road, Suite 100
Dallas, Texas 75243

Alfred LaGasse, Executive Vice President
Taxi, Limousine and Paratransit Assn.
3849 Farragut Avenue
Kensington, Maryland 20895

Peter A. Tenhula, Esq.
Senior Legal Advisor
Office of Chairman Michael K. Powell
445 12th Street, SW, 8-B201
Washington, DC 20554

Sam Feder, Esq.
Legal Advisor
Office of Commissioner Kevin J. Martin
445 12th Street, SW, 8-C302
Washington, DC 20554

Bryan Tramont, Esq.
Senior Legal Advisor
Office of
Commissioner Kathleen Q. Abernathy
445 12th Street, SW, 8-A204
Washington, DC 20554

Paul Margie, Esq.
Legal Advisor
Office of Commissioner Michael J. Copps
445 12th Street, SW, 8-A302
Washington, DC 20554

Thomas J. Sugrue, Esq.
Chief, Wireless Telecommunications Bureau
445 12th Street, SW, 3-C252
Washington, DC 20554

Kathleen Ham, Esq.
Deputy Chief
Wireless Telecommunications Bureau
445 12th Street, SW, 3-C255
Washington, DC 20554

D'wana R. Terry, Esq.
Chief, Public Safety &
Private Wireless Division
Wireless Telecommunications Bureau
445 12th Street, SW, 4-C321
Washington, DC 20554

Herbert W. Zeiler, Deputy Chief
Public Safety & Private Wireless Div.
445 12th Street, SW, 4-C343
Washington, DC 20554

Ramona E. Melson, Esq.
Deputy Chief, Public Safety &
Private Wireless Division
445 12th Street, SW, 4-C237
Washington, DC 20554

Marlene H., Dortch, Esq.
Secretary
445 12th Street, SW, TW-325
Washington, DC 20554

Michael J. Wilhelm, Esq.
Public Safety & Private Wireless Div.
Wireless Telecommunications Bureau
445 12th Street, SW
Washington, DC 20554

Qualex International
Portals II
445 12th Street, SW, Room CY-B402
Washington, DC 20554

Dennis C. Brown