

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

In the Matter of)	
)	
Revision of Part 15 of the Commission's Rules)	ET Docket 98-153
Regarding Ultra-Wideband Transmission)	
Systems)	

**SPRINT MOTION TO EXCEED PAGE LIMITATION
FOR ITS REPLY COMMENTS**

Sprint Corporation respectfully requests a waiver of FCC Rule 1.429(g), which requires that reply comments in reconsideration proceedings ordinarily be limited to 10 pages. In support thereof, Sprint states:

1. FCC Rule 1.429(g) specifies that reply comments in rulemaking reconsideration proceedings "shall not exceed 10 double-spaced typewritten pages."¹ However, FCC Rule 1.3 authorizes the Commission to waive this rule "for good cause shown."²

2. Sprint filed on June 17, 2002 a reconsideration petition of the Commission's First Report and Order in this proceeding.³ Two parties have opposed the Sprint petition: XtremeSpectrum, Inc. ("XSI"), which filed a 42-page opposition (including an 11-page, single-spaced "Technical Statement");⁴ and Time Domain Corporation ("TDC"), which filed a 19-page opposition.

¹ 47 C.F.R. § 1.429(g).

² *Id.* at § 1.3.

³ Because of the number of issues raised, and their technical nature, Sprint sought leave to file, and filed, a petition in excess of the page limit.

⁴ XSI submitted on July 22, 2002 a motion to exceed the page limit for oppositions to reconsideration petitions. Sprint does not oppose this XSI motion.

3. Sprint must respond in its reply comments to the points that XSI and TDC raise in their oppositions. Given the number and complexity of the issues, such a reply cannot practically be limited to 10 pages. The Commission has consistently granted extensions of its page limit rule in circumstances such as this where the proceeding involves “many new and complex issues.”⁵

3. Sprint further requests a waiver of FCC Rule 1.48(b), which ordinarily requires that requests for enlarged pleadings be filed “within 2 business days after the [10 day reply comment] period begins to run.”⁶ Again, given the number and complexity of the issues in this proceeding, coupled with the need to discuss these issues with technical experts, it was not possible for Sprint to comply with this generic rule in these particular circumstances.

5. No party would be prejudiced by grant of this waiver request. To the contrary, permitting Sprint to address the issues more fully will eliminate the risk of confusion and enable the Commission to act on a more complete record. Moreover, the *ex parte* process further ensures that parties will have full opportunity to address the issues raised in this proceeding.

⁵ *Federal, State and Local Public Safety Agency Communications Requirements*, 15 FCC Rcd 16844, 16884 ¶ 89 (2000). See also *Advanced Television Systems*, 12 FCC Rcd 7698 ¶ 3 (1997); *2 GHz Mobile Satellite Services*, 12 FCC Rcd 6532, 6533 ¶ 3 (1997); *Local Competition Proceeding*, 11 FCC Rcd 11882 ¶ 2 (1996); *Dominant Carrier Regulations*, 5 FCC Rcd 7139 ¶ 3 (1990); *CPE/Enhanced Services Proceeding*, CC Docket No. 85-26, at ¶ 4 (Nov. 4, 1885); *Deregulation of Radio*, 87 F.C.C.2d 797, 799 n.2 (1981).

⁶ 47 C.F.R. ¶ 1.48(b).

Wherefore, for the foregoing reasons, Sprint Corporation respectfully requests that the Commission permit it to submit reply comments that exceed 10 pages.

Respectfully submitted,

SPRINT CORPORATION



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