

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

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)	

MOTION FOR EXTENSION OF TIME

The Cellular Telecommunications & Internet Association (“CTIA”), pursuant to Part 1.46 of the Commission’s rules,¹ respectfully requests that the Commission grant a four-week extension of time to file comments in response to the “Supplemental Comments of the Consensus Parties,” which were filed on December 24, 2002.² As further detailed below, CTIA believes that there is good cause for the Commission to provide an extension of the comment and reply deadlines specified in the Commission’s

¹ 47 C.F.R. § 1.46.

² See Supplemental Comments of Aeronautical Radio, Inc., the American Mobile Telecommunications Association, the American Petroleum Institute, the Association of Public-Safety Communications Officials-International, Inc., the Forest Industries Telecommunications, the Industrial Telecommunications Association, Inc., the International Association of Chiefs of Police, the International Association of Fire Chiefs, Inc., the International Municipal Signal Association, the Major Cities Chiefs Association, the Major County Sheriffs’ Association, the National Sheriffs’ Association, National Stone, Sand and Gravel Association, Nextel Communications, Inc., the Personal Communications Industry Association, and the Taxicab, Limousine and Paratransit Association, WT Docket No. 02-55 (filed Dec. 24, 2002) (hereinafter “Supplemental Comments”).

January 3, 2003, Public Notice,³ and therefore requests that the Commission extend the comment deadline to March 3, 2003, and the reply comment deadline to March 18, 2003.

The spectrum management issues and proposals raised in this docket are of critical importance to CTIA's members, the public safety community and members of the general public, and the outcome of this proceeding will substantially affect the interests of all involved stakeholders. CTIA notes that the Supplemental Comments, which were filed on Christmas Eve, cover approximately 150 pages, including 7 detailed appendices addressing critical elements of the "Consensus Parties'" plans for funding, relocating 800 MHz incumbents, interference protections and border realignment plans. Analysis of the comments and appendices by CTIA's members, expert personnel, and other stakeholders will take substantial time and resources. Under the current deadline, however, it is impossible for CTIA's members to thoroughly review the plan presented in the Supplemental Comments and provide thorough comments that would assist the Commission in this critical proceeding.

Granting this Motion would be in the public interest because it would give commenters sufficient time to address the detailed technical and financial issues raised by the Supplemental Comments, and would provide the Commission with a more complete record upon which to base its decision. Furthermore, grant of this Motion will not prejudice any other party and will serve the interests of informed decision-making. CTIA notes that the "Consensus Parties" themselves took 62 days beyond the self-imposed deadline of October 23, 2002, to file funding information for the "Consensus Plan," thus

³ See *Wireless Telecommunications Bureau Seeks Comment on "Supplemental Comments of the Consensus Parties" Filed in the 800 MHz Public Safety Interference Proceeding – WT Docket No. 02-55, Public Notice, DA 03-19* (rel. Jan. 3, 2003).

demonstrating that time is not of the essence in what will be a multi-year relocation process.⁴ Therefore, it is far better for the public interest to take the modest additional time at the outset to provide detailed information that will assist the Commission in arriving at the best long-term solution.

⁴ See Comments of Aeronautical Radio, Inc., the American Mobile Telecommunications Association, the American Petroleum Institute, the Association of American Railroads; the Association of Public-Safety Communications Officials-International, Inc., the Forest Industries Telecommunications, the Industrial Telecommunications Association, Inc., the International Association of Chiefs of Police, the International Association of Fire Chiefs, Inc., the International Municipal Signal Association, the Major Cities Chiefs Association, the Major County Sheriffs' Association, the National Sheriffs' Association, National Stone, Sand and Gravel Association, Nextel Communications, Inc., the Personal Communications Industry Association, and the Taxicab, Limousine and Paratransit Association, WT Docket No. 02-55, at 10 (filed Sep. 23, 2002) ("We expect to finalize and file with the Commission these funding arrangements by no later than October 23, 2002.").

Respectfully submitted,

/s/ Michael Altschul

**CELLULAR TELECOMMUNICATIONS &
INTERNET ASSOCIATION**

1250 Connecticut Avenue, N.W.
Suite 800
Washington, D.C. 20036
(202) 785-0081

Michael Altschul
Senior Vice President & General Counsel

Diane Cornell
Vice President for Regulatory Policy

Christopher R. Day
Staff Counsel

Dated: January 13, 2003