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January 15, 2003

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: Ex Parte Filing; Improving Public Safety Communications in the 800
MHz Band, WT Docket No. 02-55**

**Southern Communications Services' Support of CTIA's Request for
Extension of Time**

Dear Ms. Dortch:

We are writing on behalf of Southern Communications Services, Inc. d/b/a Southern LINC, to express its support of the Motion for Extension of Time filed January 13, 2003 in the above-referenced docket. CTIA requests that the Commission extend the time for filing comments in response to the Supplemental Comments of the Consensus Parties ("Supplemental Comments") by four weeks, to March 3, 2003. CTIA commensurately requests that the Commission extend the time for filing reply comments to March 18, 2003.

Southern believes that the extension of time is fully warranted due to the complexity of the Supplemental Comments, considerations of fairness, and the importance of this proceeding. With regard to complexity, the Supplemental Comments are approximately 150 pages, including 7 appendices. Aside from the sheer length of the document and the time required to review and analyze it, the subject matter is highly complicated: it purports to establish the framework and rules for an extensive and unprecedented method for reallocating spectrum. Additionally, we have identified what appear to be several inconsistencies between what the Consensus Parties state in the Supplemental Comments and what their proposed rules actually contain. In short, it would be unduly difficult for parties wishing to meaningfully comment on the Supplemental Comments to review them, analyze them, and draft a response within thirty days.

Marlene H. Dortch, Esq.

January 15, 2003

Page 2

Considerations of fairness also play a role here. The Consensus Parties filed the "Consensus Plan" on August 7, 2002. At the time, the Consensus Parties acknowledged that several fundamental aspects of the Consensus Plan were missing, but that they were developing those aspects and would file a supplement at a later date. That supplement -- the Supplemental Comments -- was not filed until December 24. Thus, the Consensus Parties -- seventeen associations and corporations pooling their resources -- took nearly *five months* to develop the Supplemental Comments. Given that, it is only fair to give individual licensees and other commenters significantly more than thirty days to develop their responses. CTIA's request for an additional four weeks would give parties approximately two months to file comments, which would be a modest extension given the circumstances.

The importance of this proceeding also cannot be overstated. If the goal is to alleviate interference to public safety entities, it should be done right. No stage of this proceeding should be short-circuited, at the risk of jeopardizing the potential for achieving true interference reduction. Additionally, the Consensus Parties are proposing a fundamental band reallocation that could take at least four years, cost billions of dollars, and cause significant disruption to licensees. This rulemaking carries too much weight and has too many consequences for the Commission to rush through the comment stages.

In accordance with the foregoing, Southern supports CTIA's Motion for an Extension of Time. As requested by CTIA, the Commission should extend the comment due date to March 3, 2003 and the reply comment due date to March 18, 2003.

Very truly yours,

/s/ Christine M. Gill

Christine M. Gill

cc: Thomas J. Sugrue
Kathleen O'Brien Ham
D'Wana R. Terry
Ed Thomas
Lisa Gaisford
Scott Delacourt