

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Unlicensed Operation in the TV Broadcast Bands)	ET Docket No. 04-186
)	
Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band)	ET Docket No. 02-380
)	

To: Office of the Secretary,
ATTN: The Commission

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Paxson Communications Corporation (“PCC”), by its attorneys, submits herewith its support of the Motion for Extension of Time filed by the IEEE 802.18 Radio Regulatory Technical Advisory Group (“IEEE”) in the above-referenced dockets.¹ IEEE believes that the *NPRM* raises numerous complex issues that require further technical study before a consensus on feasible regulations can be reached.

PCC agrees with IEEE’s reasoning and supports its request for a 180-day extension of the comment deadline in this proceeding. IEEE is taking an important role in ensuring that incumbent broadcast television services are protected and that unlicensed devices are functional – and IEEE deserves an opportunity to succeed. The additional time requested will allow all interested parties to comment more meaningfully on the substance of the proposed rules, which

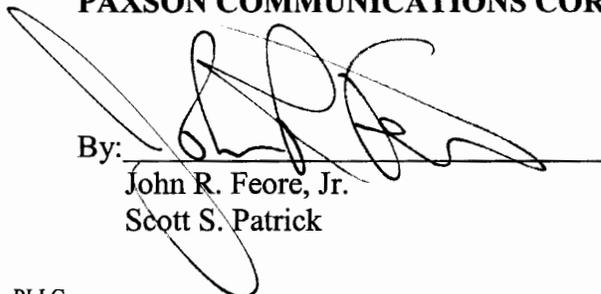
¹ Motion for Extension of Time in ET Docket Nos. 04-186, 02-380, filed by IEEE 802.18 Radio Regulatory Technical Advisory Group (Aug. 16, 2004), seeking a 180-day comment deadline extension regarding Unlicensed Operation in the TV Broadcast Bands, *Notice of Proposed Rule Making*, ET Docket Nos. 04-186, 02-380, FCC 04-113 (rel. May 24, 2004) (“*NPRM*”).

only can lead to improvements in the contemplated regulatory scheme. Moreover, important Commission policy decisions relating to post-transition channel elections and distributed transmission systems – decisions which will have a direct bearing on this proceeding – are expected in the interim.

PCC accordingly urges the Commission to grant IEEE's extension request. Broadcast television is a vital service. Adopting unlicensed device rules prematurely would threaten free, *interference-free* broadcast television service. Viewers are entitled to the confidence that they can continue to rely upon over-the-air television service as they have for decades.

Respectfully submitted,

PAXSON COMMUNICATIONS CORPORATION

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