

**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)	ET Docket No. 02-380
Below 900 MHz and in the 3 GHz Band)	
)	

To: Office of the Secretary,
ATTN: The Commission

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

The Liberty Corporation (“Liberty”), by its attorneys, hereby expresses 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 essentially believes that the type of consensus necessary to produce a feasible set of rules for governing unlicensed use of television spectrum cannot be achieved without further technical study and discussion. Liberty wholeheartedly concurs.

Proceeding as scheduled effectively would deprive parties of a meaningful opportunity to comment on the merit of the proposed rules, contrary to congressional intent.² Parties necessarily would have to speculate whether unproven and untested concepts can prevent

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*”).

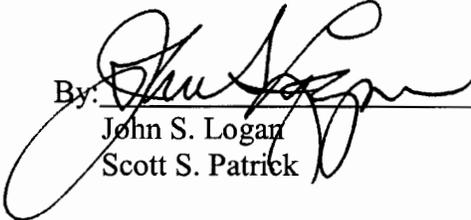
² See 5 U.S.C. § 553(b)(3).

interference to relied-upon incumbent broadcast operations that have served the public for decades. The cost of ignoring the technical studies to which IEEE refers could be significant, given the potential ubiquity of the proposed unlicensed devices and the potential inability to remedy any interference – which especially is important to in light of the new over-the-air service and programming opportunities that DTV promises.

Accordingly, Liberty agrees that extending the comment deadlines in this proceeding for 180 days would serve the public interest by allowing the interested parties to conduct technical studies and discussions that in turn could permit meaningful comment and consensus.

Respectfully submitted,

THE LIBERTY CORPORATION

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