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

In the Matter of

Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002

AU Docket No. 14-252
GN Docket No. 12-268

JOINT REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT DEADLINES

The Consumer Electronics Association, CTIA – The Wireless Association®, and the Telecommunications Industry Association (collectively, “Petitioners”), hereby respectfully submit this request for a 30 day extension of the comment and reply comment deadlines in the above-captioned proceeding. In a Public Notice, the Commission seeks comment on detailed procedures for the upcoming broadcast television incentive auction.\(^1\) The comment and reply comment deadlines are currently set for January 30, 2015 and February 27, 2015.\(^2\) The Petitioners hereby request that comments be due no later than March 2, 2015 and that reply comments be due no later than March 30, 2015. A 30 day extension is in the public interest to allow subject matter experts at interested companies to examine the novel issues raised by this auction and to develop a meaningful record in this proceeding. Further, there are numerous incentive auction-related comment deadlines in January and February, and an extension of time will permit interested parties to dedicate the resources necessary to drafting fulsome comments in response to the Public Notice. Meanwhile, grant of the requested extension should not cause the incentive auction itself to be delayed.

\(^1\) Comment Sought on Competitive Bidding Procedures for Broadcast Incentive Auction 1000, Including Auctions 1001 and 1002, Public Notice, FCC 14-191 (Dec. 17, 2014).

\(^2\) Id.
Petitioners seek an extension of time to allow interested parties’ auction experts to analyze the Public Notice and prepare thorough responses to the Public Notice. As of today, Auction 97 – the Commission’s AWS-3 spectrum auction – is still ongoing. Several potential incentive auction bidders are also bidders in Auction 97. Key personnel for these companies are currently sequestered and may be unavailable to assist with comments and/or reply comments until bidding is complete. Further, once bidding concludes Section 1.2105(c)’s prohibition on certain communications will not end for another ten business days. For industry associations such as Petitioners, their Auction 97 bidder members will not be able to openly discuss potential comments and/or reply comments until the auction “quiet period” has ended. The requested extension will permit individual Auction 97 bidders to fully dedicate the resources of their auction experts to comments filed in this proceeding, and it will also permit industry associations such as Petitioners to engage in greater discussion with their member companies regarding comments and reply comments. And, to the extent there are key “lessons learned” from Auction 97 that inform the broadcast television incentive auction, comments and reply comments will be able to discuss these matters.

Further, the comment deadlines in response to the Public Notice are among several incentive auction-related deadlines in January and February 2015. The Commission has sought comment on issues related to low power television (comments and replies due January 12, 2015 and January 26, 2015), interservice interference (comments and replies due January 21, 2015)

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and February 5, 2015), designated entity issues (comments and replies due January 23, 2015 and February 12, 2015), and wireless microphones/unlicensed operation (comments and replies due February 4, 2015 and February 25, 2015). These proceedings all require the attention of many of the same personnel within each individual commenting party. By granting the requested 30 day extension, the Commission will enable interested parties to more thoroughly examine the complex issues in the Public Notice and dedicate the resources needed to develop a more robust record.

Petitioners recognize that requests to extend filing deadlines are not routinely granted, but the Commission has previously concluded that an extension is warranted when such an extension is necessary to ensure that the Commission receives full and informed responses and that affected parties are given a meaningful opportunity to develop a complete record for the Commission’s consideration. In the case of the Public Notice, the Commission is asking

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complicated questions about a novel auction process. Petitioners believe that the proposed extension of time is appropriate and will enable interested parties to provide detailed input on the important issues raised by the Public Notice. Petitioners do not expect that the requested extension will cause the incentive auction itself to be delayed, as the Commission will have sufficient time to resolve issues raised in the Public Notice docket prior to the currently-scheduled auction date. For these reasons, a 30 day extension of comment and reply comment deadlines in this proceeding is in the public interest.

For the foregoing reasons, an extension of time will help ensure the development and submission of a more thorough and meaningful record for the Commission to consider.

Respectfully submitted,

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