Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Part 15 of the Commission’s Rules for Unlicensed Operations in the Television Bands, Repurposed 600 MHz Band, 600 MHz Guard Bands and Duplex Gap, and Channel 37, and

Amendment of Part 74 of the Commission’s Rules for Low Power Auxiliary Stations in the Repurposed 600 MHz Band and 600 MHz Duplex Gap

Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions

Promoting Spectrum Access for Wireless Microphone Operations

ET Docket No. 14-165

GN Docket No. 12-268

GN Docket No. 14-166

COMMENTS OF BROAD COMM, INC. IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

Broad Comm, Inc. (“Broad Comm”) submits these Comments in support of the Motion for Extension of Time to File Comments filed by Shure Incorporated (“Shure”) on December 2, 2014, in the above-referenced proceedings (the “NPRMs”). Shure requests a 45-day extension of filing deadlines in these two rulemaking proceedings so that comments in both proceedings would be due by February 19, 2015, and reply comments would be due by March 12, 2015.

Broad Comm, Inc. is widely regarded as a leader in frequency coordination for large scale events, complex operating environments, and global broadcasts. As such, Broad Comm, Inc. is intensely interested in the outcome of the Commission’s proceedings to consider proposals that would substantially revise the Part 15 rules that apply to microphone and unlicensed operations in unassigned TV channels (i.e., “white spaces”) and the rules that apply to
wireless microphone operations in other spectrum bands, including spectrum never before made available to wireless microphones and currently designated for other government and nongovernment uses.

Broad Comm, Inc. recognizes that the Commission does not routinely grant extensions but in this case, good cause exists to extend the filing deadlines as requested. Shure’s request highlights the many complicated technical and policy issues raised by the proposed rule amendments in these proceedings that will, if adopted, have a sweeping impact, in the immediate future and in the long term, on the wireless microphone industry and the many sectors served by that industry including users in broadcast, music, theater, sports, education, worship, hospitality, and government. Parties interested in these proceedings require significant additional time to analyze the impact of the multiple proposed rule changes many of which raise complex operational issues and entail new technical changes that have not been previously tested. Further, the pleading periods fall over the winter holiday period making the existing filing periods even more challenging. Finally, grant of the requested modest extension of time will not cause prejudice or hardship to any interested party or to the Commission. In fact, a grant of the 45-day extension as outlined in the Shure’s request would give parties a meaningful opportunity to consider technically complex and extensive issues and to develop a complete record for the Commission’s consideration.
Given the complexity of the legal, technical, and operational issues presented in the two NPRMs, the dramatic, permanent impact on the entire wireless microphone community that such rule changes would involve, and the intervening holidays, a 45-day extension is warranted.

Respectfully Submitted,

/s/ Louis Libin
President, Broad Comm, Inc.
NYC UHF BAS Frequency Coordinator
382 Forest Avenue
Woodmere, NY 11598