

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

|  |   |                      |
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| 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 |
|  | ) |                      |

**Via the ECFS**

**MOTION FOR EXTENSION OF TIME**

The IEEE 802.18 Radio Regulatory Technical Advisory Group (the “RR-TAG”) respectfully requests that the Commission extend the deadlines for comments and reply comments in the above-captioned Proceeding (“the NPRM”) by 180 days beyond their current dates of September 1, 2004 and October 1, 2004 respectively.

While we *fully* support the Commission’s intent – to enable the use of otherwise geographically unused TV channels on a strictly non-interfering basis to the incumbent licensed services – we also *strongly* believe that the NPRM in this Proceeding raises many complex issues and questions that require further technical studies and discussions amongst all of the interested parties in order to develop the consensus necessary to provide both the best possible body of comment and the least potential for contention in the subject Proceeding.

The Commission should note that many of the interested parties<sup>1</sup> are, and have increasingly been, working cooperatively together in IEEE 802.18’s Study Group 1 on technical studies and discussing potential solutions to the sharing/non-interference issues that are of paramount importance in this Proceeding.

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<sup>1</sup> Participation has involved not only traditional license exempt device interests, but representatives from the TV broadcast industry, the public safety community, and the consumer electronics industry – all of whom have a stake in the outcome of this Proceeding.

We believe that this cooperative effort amongst the stakeholders holds considerable promise, *if allowed sufficient time*, for bringing the Commission broad-based consensus recommendations that will be, at least substantially, supported by all of the interested parties – the unlicensed device community, TV broadcasters, public safety PLMRS interests, and consumer electronics manufacturers.

The participating interested parties are collectively committed to continue to working cooperatively together to pursue further technical studies and discussions, aimed at arriving at technical and regulatory solutions that the parties are confident are feasible and that support recommendations for rules that will both allow practical use of the subject spectrum by license-exempt devices and assure the necessary protection of the incumbent licensed services.

Additionally, the IEEE 802 Executive Committee has approved the formation of a new Working Group (tentatively designated as IEEE 802.22), chartered to develop a cognitive PHY/MAC/air interface standard targeted to meet the unique needs of sharing on a strict non-interference basis in the TV bands (formation of the Working Group is pending final Standards Board approval, which we hope to gain at the Standards Board's next meeting in late September). In the meantime, work will continue to progress in IEEE 802.18 SG1.

We believe that the requested delay will have no negative impact on the public interest and see no compelling need for the Commission to maintain the current comment and reply comment deadlines for this Proceeding, which would only preclude the parties from having the necessary time to complete further cooperative studies and make every effort to develop broad-based consensus recommendations to the Commission.

Thus, we believe that the Commission's goals – and the public interest – would best be served by the Commission's prompt grant of the requested extension of the comment and reply comment deadlines and we ask the Commission to grant the request without delay.

Respectfully submitted,

/s/

Carl R. Stevenson  
Chair, IEEE 802.18 Radio Regulatory Technical Advisory Group  
Chair, IEEE 802.18 Study Group 1 On Unlicensed Use of TV Spectrum  
Interim Chair, (of the pending) IEEE 802.22 Working Group  
4991 Shimerville Road  
Emmaus, PA 18049  
610-965-8799  
carl.stevenson@ieee.org