

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

COMMENTS IN SUPPORT OF THE MOTION FOR EXTENSION OF TIME

The Consumer Electronics Association (CEA) supports the IEEE 802.18 Radio Regulatory Technical Advisory Group (IEEE 802.18) request to 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.

We applaud and support the efforts of the Commission to allow for unlicensed device operation in the vacant broadcast television bands. However, we must ensure that unlicensed devices do not interfere with broadcast TV reception.

To do so, CEA has carefully examined the proposals outlined in the NPRM and have begun discussions with other interested parties. At this time, we believe that in order to effectively respond to the complex proposals raised in the NPRM, we need more time to work with interested parties to develop consensus solutions to interference concerns. This work will include technical studies and multifaceted field-testing that will involve multi-industry cooperation.

CEA is committed to finding technical solutions that will allow for unlicensed use of vacant TV channels on a non-interference basis. In order to best serve the public interest, additional time is needed to provide a complete and thorough technical analysis of the complex NPRM and develop comprehensive technical solutions to interference concerns.

For these reasons, CEA supports IEEE’s motion for a 180 day extension for comments and reply comments and pledges our commitment to developing consensus

solutions that will allow for unlicensed operations in the vacant TV bands on a non-interference basis.

Respectfully submitted,



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