

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

To: Office of the Secretary,
ATTN: The Commission

COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME

Cox Broadcasting, Inc. (“Cox”), by its attorneys, hereby supports 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 asks for an extension to allow interested parties to pursue technical studies necessary to address the complex issues and questions raised in this proceeding. IEEE further maintains that an extension would help develop the consensus needed to produce feasible regulatory solutions for protecting incumbent television broadcast service.

Cox agrees. In its prior comments at the *Notice of Inquiry* stage, Cox urged the Commission to proceed cautiously.² Cox explained that widespread commercial success of the

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, ET Docket Nos. 04-186, 02-380, *Notice of Proposed Rule Making*, FCC 04-113 (rel. May 24, 2004) (“*NPRM*”).

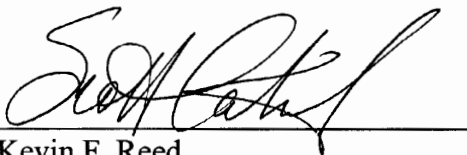
² See, e.g., Cox Comments at 8 in response to *Notice of Inquiry* in ET Docket No. 02-380, 17 FCC Rcd 25632 (2002).

new unlicensed devices was likely, so interference problems would be pervasive if they occurred.³ The Commission nonetheless issued the *NPRM* – prematurely, in Cox’s opinion – and at this time broadcasters find they cannot reasonably evaluate the proposed rules or the risk of harmful interference.

For these reasons Cox supports extending the comment deadline by 180 days. Cox applauds IEEE’s role in pursuing methodical technical studies intended to allow all interested parties to reach meaningful conclusions about the potential for harmful interference. Cox shares IEEE’s optimism that such studies could help formulate consensus recommendations for regulating unlicensed operation in the television spectrum. Accordingly, Cox asks that the Commission grant IEEE’s extension request.

Respectfully submitted,

COX BROADCASTING, INC.

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Dated: August 18, 2004

³ Cox Comments at 8.