

**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

**OPPOSITION TO MOTION FOR EXTENSION OF TIME**

Intel Corporation strongly opposes the IEEE 802.18 Radio Regulatory Technical Advisory Group (IEEE 802.18) request that the Federal Communications Commission (“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. Intel believes a delay of a half-year for comments is extreme and unwarranted.

Intel has been heavily involved in multiple studies and testing with many parties and intends to continue such work. Intel sees no merit to the IEEE 802.18’s contentions that the Commission’s comment deadline would “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.”

Though actively involved in discussions, as mentioned above, Intel recognizes that it and the IEEE 802.18 might not represent the total activity in this area. Therefore, the discussion can only be enhanced by gaining access to public input, through the comment process, sooner rather than later. Contrary to the IEEE 802.18’s ascertain, a delay of 180 days *will* have a negative impact on the public interest as the aforementioned studies would proceed without the benefit of information that could have been revealed months earlier.

Accordingly the Commission should reject the motion for an extension, or at most allow

an extension of 30 days.

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Respectfully submitted,

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