

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Office of Engineering and Technology)	ET Docket No. 14-14
Seeks to Supplement the Incentive Auction)	
Proceeding Record Regarding Potential)	
Interference Between Broadcast Television)	
And Wireless Services)	
)	
Expanding the Economic and Innovation)	GN Docket No. 12-268
Opportunities of Spectrum Through)	
Incentive Auctions)	

**MOTION FOR EXTENSION OF TIME OF THE
NATIONAL ASSOCIATION OF BROADCASTERS, ABC TELEVISION AFFILIATES
ASSOCIATION, CBS TELEVISION NETWORK AFFILIATES ASSOCIATION, FBC
TELEVISION AFFILIATES ASSOCIATION, NBC TELEVISION AFFILIATES, THE WALT
DISNEY COMPANY, 21ST CENTURY FOX, INC., NBCUNIVERSAL MEDIA, LLC, CBS
CORPORATION, UNIVISION TELEVISION GROUP INC., THE ASSOCIATION OF
PUBLIC TELEVISION STATIONS, AND PUBLIC BROADCASTING SERVICE**

The National Association of Broadcasters (“NAB”)¹, ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, NBC Television Affiliates², The Walt Disney Company, 21st Century Fox, Inc., NBCUniversal Media, LLC, CBS Corporation, Univision Television Group Inc.,

¹ The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of free local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² Each of the ABC Television Affiliates Association, CBS Television Network Affiliates Association, FBC Television Affiliates Association, and NBC Television Affiliates is a non-profit trade association whose members consist of local television broadcast stations throughout the county that are affiliated with its respective broadcast television network.

Association of Public Television Stations, and Public Broadcasting Service³ (collectively, the “Broadcast Parties”) hereby respectfully submit this request for a limited extension of the comment deadline established by the Office of Engineering and Technology (“OET”) for supplementing the record in the above-captioned proceedings.⁴ Comments are currently due by February 28, 2014. Pursuant to Section 1.46 of the Commission’s rules,⁵ the Broadcast Parties request a 30-day extension of the deadline, such that comments would be due by March 31, 2014. A limited extension of time is in the public interest to allow interested parties the time necessary to address the complex engineering and policy issues on which OET seeks comment.

In its Public Notice, OET seeks comment on a proposed methodology for calculating predicted potential interference between broadcast television and licensed wireless services. This issue is of critical importance in the Commission’s incentive auction proceeding, for at least two reasons. First, wireless service providers bidding in the forward auction have a strong interest in knowing the degree to which licenses on which they are bidding may be partially impaired by potential interference, or to which operations in certain Economic Areas may be restricted by the need to prevent harmful interference between the broadcast and wireless services. Second, the proposed methodology is directly related to the technical aspects of the repacking process and the

³ The Association of Public Television Stations and the Public Broadcasting Service are non-profit membership organizations whose members consist of the noncommercial educational licensees of over 350 television broadcast stations throughout the country.

⁴ *Office of Engineering and Technology Seeks to Supplement the Incentive Auction Proceeding Record Regarding Potential Interference Between Broadcast Television and Wireless Services*, Public Notice, ET Docket No. 14-14, GN Docket No. 12-268, DA 14-98 (rel. Jan. 29, 2014) (Public Notice).

⁵ 47 C.F.R. § 1.46(b).

auction design, and will have a direct impact on broadcasters' post-auction service areas.⁶

Repacking is a significant component of the incentive auction proceeding, both in terms of freeing up spectrum for auction and ensuring that broadcasters are able to continue to provide service to the same coverage area and population following repacking. Any potential changes in how inter-service interference may be calculated for the purposes of repacking should be carefully considered, and interested parties should have time to fully consider and analyze OET's proposed methodology. The proposed methodology itself is quite complex, and analysis of the methodology and its potential ramifications is computationally intensive.

OET has scheduled a workshop intended to provide further detail regarding the proposed methodology, as well as to answer questions from interested parties.⁷ This workshop is scheduled for February 21, 2014 – just one week prior to the comments deadline. The agenda for this workshop indicates that staff will present information on, among other things, the potential application of the methodology to the incentive auction as well as implementing the methodology using *TVStudy*.⁸ Allowing interested parties sufficient time to consider and analyze information presented during this workshop, and to incorporate that analysis into their comments, will only help ensure a more complete record in this proceeding.

The Broadcast Parties respectfully submit that a brief extension of time will allow all interested parties the time necessary to address the complex engineering and policy

⁶ Public Notice at 7.

⁷ *OET Announces Agenda for Workshop on Inter-Service Interference Prediction*, Public Notice, ET Docket No. 14-14, GN Docket No. 12-268, DA 14-186 (rel. Feb. 11, 2014).

⁸ *Id.* at 2.

issues raised by the OET Public Notice, ultimately providing a more complete record for staff to consider. Thus, any extension of time should not serve to delay the Chairman's stated goal of circulating an order this Spring, but, rather, will help keep that timeline in place.

Respectfully submitted,

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