

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

In the Matter of	)	
	)	
Amendment of Parts 15, 73 and 74 of the	)	MB Docket No. 15-146
Commission's Rules to Provide for the	)	
Preservation of One Vacant Channel in the UHF	)	
Television Band For Use By White Space Devices	)	
And Wireless Microphones	)	
	)	
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**

The National Association of Broadcasters (“NAB”)<sup>1</sup>, hereby respectfully requests a limited extension of the deadline for filing comments on the Commission’s proposal to preserve one television channel for use by TV White Space Devices and wireless microphones following the broadcast spectrum incentive auction.<sup>2</sup> Comments are currently due by August 3, 2015, and reply comments are due by August 31, 2015. Pursuant to Section 1.46 of the Commission’s rules,<sup>3</sup> NAB requests a 21-day extension of the comment deadline, such that comments would be due by August 24, 2015, and reply comments would be due by September 23, 2015.

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<sup>1</sup> 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.

<sup>2</sup> *Amendment of Parts 15, 73 and 74 of the Commission’s Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones*, Notice of Proposed Rulemaking, MB Docket No. 15-146, GN Docket No. 12-268, FCC 15-68 (June 16, 2015).

<sup>3</sup> 47 C.F.R. § 1.46(b).

A limited extension of time is in the public interest in light of new issues that have arisen with respect to the question of whether and how to reserve a television channel in the UHF band following the auction. The issue of available spectrum for unlicensed uses and wireless microphones is closely connected to the question of whether, and in how many markets, the Commission elects to relocate television stations in the duplex gap following the auction. A number of parties, including NAB, have filed proposals relating to the use of the duplex gap and its potential impairment.<sup>4</sup> In light of this, NAB submits that the Commission will have a better, more informed record in this proceeding if comments are filed after the release of the forthcoming Procedures Public Notice. Because the vote on the Procedures Public Notice was delayed by three weeks, NAB respectfully submits that a three-week delay in the comment deadline in this proceeding would be appropriate.

NAB appreciates the Commission's urgency in seeking to resolve open issues in the auction proceeding to allow the auction to commence in early 2016. In this case, an extension will not hamper that goal, as the reservation of a television channel is a post-auction issue. NAB respectfully submits that a 21-day extension will not in any way affect the start of the auction, and is reasonable under the circumstances to ensure that all stakeholders have an opportunity to provide informed comments in light of recent developments. Moreover, the decisions made with respect to the issues presented by the proposal will have long-lasting impacts on the future of the broadcast television industry.

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<sup>4</sup> See, e.g., Letter from Rick Kaplan to Marlene H. Dortch, GN Docket No. 12-268, WT Docket No. 12-269, AU Docket No. 14-252 (July 21, 2015).

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**

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A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right from the end of the signature.

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Rick Kaplan  
Patrick McFadden

July 24, 2015

## Your submission has been accepted

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### Proceedings

Name	Subject
12-268	Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions
15-146	Amendment of Parts 15, 73 and 74 of the Commission's Rules to Provide for the Preservation of One Vacant Channel in the UHF Television Band For Use By White Space Devices and Wireless Microphones

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### Details

**Type of Filing:** MOTION FOR EXTENSION OF TIME

### Document(s)

File Name	Custom Description	Size
Extension request for reserved channel comments.pdf		32 KB

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