

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Wireless E911 Location Accuracy Requirements	)	PS Docket No. 07-114
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196
	)	

**JOINT REQUEST FOR EXTENSION OF COMMENT AND REPLY COMMENT DEADLINES**

The Association of Public-Safety Communications Officials – International (“APCO”), the National Emergency Number Association (“NENA”), the National Association of State 911 Administrators (“NASNA”), CTIA – The Wireless Association® (“CTIA”), and the Telecommunications Industry Association (“TIA”) (collectively, “Petitioners”) hereby respectfully submit this request for an extension of the comment and reply comment deadlines in the above-captioned proceedings, currently set for January 3, 2011 and January 31, 2011.<sup>1</sup> The Petitioners hereby request that comments be due no later than January 19, 2011 and that reply comments be due no later than February 18, 2011. A short-term extension is in the public interest to allow interested parties to meaningfully address the issues raised in this proceeding.

In particular, Petitioners seek an extension of time to permit various Communications Security, Reliability and Interoperability Council (“CSRIC”) working groups to develop and finalize recommendations relating to E911 and next generation 911. Several of Petitioners are actively engaging in working on CSRIC Working Group 4B – Transition to NG9-1-1 and

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<sup>1</sup> *Wireless E911 Location Accuracy Requirements, E911 Requirements for IP-Enabled Service Providers*, Further Notice of Proposed Rulemaking and Notice of Inquiry, FCC 10-177 (Sept. 23, 2010) (“Notice”); *Public Safety and Homeland Security Bureau Announces Comment and Reply Comment Dates for the Further Notice of Proposed Rulemaking and Notice of Inquiry in the E911 Location Accuracy Proceeding*, Public Notice, DA 10-2111 (Nov. 2, 2010).

Working Group 4C – Technical Options for E9-1-1 Location Accuracy.<sup>2</sup> Many of these working group members plan to file comments and/or reply comments in this proceeding. Accordingly, the requested extension will allow working group members time to develop thorough recommendations for the CSRIC and meaningful comments in this proceeding.<sup>3</sup> Further, all interested parties in this proceeding will be able to review the CSRIC working group recommendations and develop the record accordingly. Notably, in its recent Further Notice of Proposed Rulemaking and Notice of Inquiry the Commission highlighted the important role of CSRIC in examining the central issues in this proceeding, including but not limited to the reliability of public safety communications systems, E911 location technologies, next generation public safety applications, and emerging E911 public safety location technologies.<sup>4</sup> In fact, the Commission stated that it “look[s] forward” to receiving CSRIC’s recommendations.<sup>5</sup>

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<sup>2</sup> Federal Communications Commission, The Communications Security, Reliability and Interoperability Council, at <http://www.fcc.gov/pshs/advisory/csric/>.

<sup>3</sup> Further, Petitioners note the proximity of the current initial comment deadline to the end-of-year holiday period, further arguing for a short-term comment extension to allow appropriate time for drafting of fulsome comments. The Commission adopted the Further Notice of Proposed Rulemaking and Notice of Inquiry in this proceeding on September 23, 2010. The comment dates were established more than a month later with the publication of the Commission's summary in the Federal Register. See *Public Safety and Homeland Security Bureau Announces Comment and Reply Comment Dates for the Further Notice of Proposed Rulemaking and Notice of Inquiry in the E911 Location Accuracy Proceeding*, Public Notice, DA 10-2111 (Nov. 2, 2010).

<sup>4</sup> *Notice* at ¶ 12 (“CSRIC is a Federal Advisory Committee that provides guidance and expertise on the nation’s communications infrastructure and public safety communications. The committee’s duties include recommending best practices and actions the Commission can take to ensure the security, reliability, operability and interoperability of public safety communications systems, and improve reliability and resiliency of communications infrastructure. One of the Working Groups within CSRIC, Group 4C - Technical Options for E911 Location Accuracy, is responsible for examining E911 and public safety location technologies in use today, identifying current performance and limitations for use in next generation public safety applications, examining emerging E911 public safety location technologies, and recommending options to CSRIC for the improvement of E911 location accuracy timelines.”).

<sup>5</sup> *Id.* at ¶ 15 (“As noted above, the CSRIC is exploring issues related to wireless location technologies. In this regard, we look forward to receiving the recommendations of this committee.”).

Petitioners recognize that requests to extend filing deadlines are not routinely granted, but the Commission has previously found that an extension is warranted when such an extension is necessary to ensure that the Commission receives full and informed responses and that affected parties have a meaningful opportunity to develop a complete record for the Commission's consideration.<sup>6</sup> Under these circumstances, Petitioners believe that the proposed extension of time is appropriate, as interested parties can incorporate the CSRIC working group findings into their comments and reply comments, and parties involved in both CSRIC and this proceeding will have the time necessary to prepare full and informed comments and reply comments.

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<sup>6</sup> See, e.g., *Wireless Telecommunications Bureau Grants Extension of Time to File Reply Comments on Commercial Mobile Radio Services Market Competition*, Public Notice, WT Docket No. 09-66, DA 09-1419 (WTB rel. June 24, 2009) (granting 14-day extension in order for “development of a complete record on the issues”); *Media Bureau Grants Extension of Time to File Comments and Reply Comments In Response to Broadcast Localism Notice of Proposed Rulemaking*, Public Notice, MB Docket No. 04-233, DA 08-515 (MB 2008) (“we agree that an extension of the comment and reply comment period is warranted to enable commenters to adequately review, investigate, and comment on the specific issues raised in the NPRM and respond to the extensive comments filed in response thereto”); *Reexamination of Roaming Obligations of Commercial Mobile Radio Service Providers*, Order, 20 FCC Rcd 19868, ¶ 3 (WTB 2005); *Service Rules for Advanced Wireless Services in the 2155-2175 MHz Band, Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands*, Order, 23 FCC Rcd 10527, ¶ 4 (WTB 2008); *Elimination of Rate-of-Return Regulation of Incumbent Local Exchange Carriers, Federal-State Joint Board on Universal Service*, Order, 18 FCC Rcd 26307, ¶ 2 (WCB 2003); *Telephone Number Portability*, Order, 18 FCC Rcd 26604, ¶ 2 (WCB 2003).

For the foregoing reasons, an extension of time will help ensure the development and submission of a more thorough and meaningful record for the Commission to consider.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY  
COMMUNICATIONS OFFICIALS –  
INTERNATIONAL

By: /s/ Robert M. Gurss  
Robert M. Gurss  
Regulatory Counsel  
1725 DeSales Street, NW, Suite 808  
Washington, DC 20036  
(571) 312-4400

NATIONAL EMERGENCY NUMBER  
ASSOCIATION

By: /s/ Brian Fontes  
Brian Fontes  
CEO  
4350 North Fairfax Drive, Suite 750  
Arlington, VA 22203-1695  
(703) 812-4600

NATIONAL ASSOCIATION OF STATE 911  
ADMINISTRATORS

By: /s/ Richard Taylor  
Richard Taylor  
President  
3810 Mitchell Circle  
New Bern, NC 28562-5028  
(919) 754-2942

**CTIA – THE WIRELESS ASSOCIATION®**

By: /s/ Brian M. Josef  
Brian M. Josef  
Director, Regulatory Affairs  
1400 16<sup>th</sup> Street, NW, Suite 600  
Washington, DC 20036  
(202) 785-0081

TELECOMMUNICATIONS INDUSTRY  
ASSOCIATION

By: /s/ Danielle Coffey  
Danielle Coffey  
Vice President, Government Affairs  
2500 Wilson Blvd., Suite 300  
Arlington, VA 22201  
(703) 907-7700

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