

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

In the Matter of)
Acceleration of Broadband)
Deployment Expanding the Reach)
and Reducing the Cost of Broadband) WC Docket No. 11-59
Deployment by Improving Policies)
Regarding Public Rights of Way and)
Wireless Facilities Siting)

**COMMENT IN SUPPORT OF THE
MOTION FOR EXTENSION OF TIME**

SCAN, which has filed Comments in the above captioned matter, now files this comment supporting the National League of Cities et al. (jointly, the “National Associations”) petition, filed on August 5, 2011, asking the Commission extend the time of filing reply comments in the above captioned matter from August 30, 2011 to October 31, 2011.

SCAN, an independent incorporated organization, represents over three hundred fifty government broadband and wireless telecommunications officers and advisors in California and Nevada. We full agree with the National Associations that the extension of time to file reply comments which they request is proper and useful in creating a more complete and accurate record in the instant proceeding. Therefore the requested extension of the deadline for filing reply comments serves

the public interest, and assists the Commission in reaching decisions that are based on facts rather than assertions.

We note that many of the telecommunications industry commenters, including the PCIA, the CTIA, the DAS Forum, and NextG Networks, Inc., allege unsubstantiated bad acts on the part of various governments, including local governments in California. As noted by the National Associations, local governments around the country, alleged by the industry of being bad actors, were not served with copies of the industry comments, thus denying the local governments the opportunity to meaningfully respond to the allegations in order to set the record straight. Accordingly, there is a vital need for various local governments to conduct research into the relevant facts and to compare and contrast them with the bare allegations made by the telecommunications industry in order to then reduce these facts to reply comments.

Also, as noted by the National Associations, several their member organizations, including the International Municipal Lawyers Association, the National Association of Telecommunications Officers and Advisors, the American Public Works Association, and the International City/County Management Association, hold their annual national conferences shortly after the current filing deadline. Given the national importance of the underlying issues raised in matter, it is in the public interest for the Commission to extend the reply comment

deadline to allow these organizations to interact with their many thousands of individual members to produce and file additional comments and information useful to the Commission and the public in this matter. In addition, the comment deadline extension will allow the local governments that have been painted as alleged bad actors sufficient time to conduct their research and provide their informed and factually supported comments in this proceeding.

SCAN agrees with the facts as set out in the petition of the National Associations. A short 60-day extension as petitioned by the National Associations will allow for the development of a much more complete and accurate record for the Commission to consider.

For the above reasons, SCAN urges the Commission to grant the National Associations' request that the Commission extend the deadline for reply comments in this matter from August 30th to October 31st.

Respectfully submitted,

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