

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

In the Matter of)	
)	
Amendment of Section 73.3555(e) of the)	MB Docket No. 17-318
Commission's Rules, National Television)	
Multiple Ownership Rule)	
)	

MOTION FOR EXTENSION OF TIME

Pursuant to 47 C.F.R. § 1.46, the National Association of Broadcasters (NAB)¹ hereby requests that the Commission grant an extension of the deadlines for the submission of comments and reply comments in response to the Notice of Proposed Rulemaking in the above-captioned proceeding.² Comments are currently due on February 26, 2018 and reply comments on March 27, 2018. NAB respectfully requests an extension of these deadlines until March 28, 2018 and April 27, 2018. The requested extension would materially assist the broadcast television industry in preparing comments addressing the complex issues in this proceeding, and help ensure that the Commission has more complete and thorough information from all interested parties.

The Notice undertakes a broad assessment of the FCC's national TV audience reach cap, including the methodology used to calculate compliance with the cap, in light of increased video programming options for consumers, technological developments and other factors. Notice at ¶ 1. The Notice seeks comment on the FCC's authority to modify or

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

² Notice of Proposed Rulemaking, MB Docket No. 17-318, FCC 17-169 (Dec. 18, 2017) (Notice).

eliminate the national cap and its calculation methodology, and asks whether the Commission should modify or eliminate the current 39 percent national audience reach cap and how parties should determine compliance with it. *Id.*

While motions for extension of time are not, and should not be, routinely granted, 47 C.F.R. § 1.46, the Commission should do so here. This proceeding raises many complex legal and economic issues. NAB does not often request extensions of time, but in this case, the wide range of broadcasters in the TV industry need additional time to fully consider their positions and present complete and thoughtful comments to the Commission. All parties to the proceeding, including broadcasters, will benefit from an extension of time to prepare comments addressing all the relevant issues and providing up-to-date data and information about the current video marketplace. The Commission also will benefit from carefully considered comments and a complete record. Moreover, a short extension of time will not adversely impact any party or the public interest.

Because an additional 30 days for comment in this proceeding will benefit both commenting parties and the Commission, and will not disadvantage any party, NAB urges the Commission to extend the period for submitting comments and reply comments until March 28, 2018 and April 27, 2018, respectively.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS
1771 N Street, NW
Washington, DC 20036
(202) 429-5430



Rick Kaplan
Jerianne Timmerman

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