

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

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In the Matters of)
) MM DOCKET NO. 91-21
) FEDERAL COMMUNICATIONS COMMISSION
) OFFICE OF THE SECRETARY
Review of the Commission's Regulations)
Governing Television Broadcasting)
)
Television Satellite Stations Review of) MM Docket No. 87-8
Policy and Rules)
)
Review of the Commission's Regulations) MM Docket No. 94-150
Governing Attribution of Broadcast Interests)
)
Review of the Commission's Regulations and) MM Docket No. 92-51
Policies Affecting Investment in the)
Broadcast Industry)
)
Reexamination of the Commission's Cross-) MM Docket No. 87-154
Interest Policy)
)
Policies and Rules Regarding Minority and) MM Docket Nos. 94-149
Female Ownership of Mass Media Facilities) and 91-140

TO THE COMMISSION

MOTION FOR EXTENSION OF TIME

The Minority Media and Telecommunications Council ("MMTC")^{1/} respectfully moves for extensions of time of three months in the comment and reply comment dates in each^{2/} of these proceedings.^{3/}

This request is made for two reasons. First, Congress seems likely to act on the issues germane to the multiple ownership and minority ownership dockets imminently. Parties to the rulemaking proceedings would benefit from knowing what Congress intends to do

^{1/} MMTC, founded in 1986, is the association of attorneys, scholars, engineers and economists which assists the civil rights community in communications policy matters.

^{2/} Each of the above captioned dockets is linked to the other dockets; consequently, the comment dates for each docket are the same (April 17 for comments, May 17 for reply comments). Thus, MMTC's request would apply to each of the dockets.

^{3/} MMTC understands that on March 31, AWRT moved for an extension of time of three months in dockets 94-149 and 91-140. MMTC supports AWRT's motion. MMTC is moving for the same amount of time in order to conform to AWRT's proposal, which seems entirely reasonable.

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so that they can tailor their comments accordingly.^{4/} Moreover, an extension of time until Congress has acted will render it unnecessary for the Commission to request a second round of comments.^{5/}

Second, for the past two months, MMTC and other civil rights organizations have been compelled to devote substantial time and resources attempting to save the tax certificate policy. This struggle has substantially impaired their ability to develop the enormous volume of research and analysis the Commission will require in order to have a robust and useful record before it.^{6/}

Nobody wants these proceedings to be resolved expeditiously more than MMTC does. Nonetheless, the Commission should grant a reasonable extension of time in order to conserve resources, produce a better record, and enhance the likelihood of a consensus solution.

Respectfully submitted,



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April 3, 1995

^{4/} Furthermore, a decision in Adarand Constructors, Inc. v. Peña, No. 93-1841 (Sup. Ct., argued January 17, 1995) may need to be addressed by commenters in the Commission's proceedings.

^{5/} Indeed, in some respects, the NPRMs may need to be amended to seek comment on rules implementing Congress' actions. The Commission may also need to propound additional questions for comment or recast some of the questions on which it has already sought comment.

^{6/} MMTC has been engaged in a study of the relative retention rates of minority and nonminority owned stations -- a topic recommended to it by the Commission's staff and by members of Congress.