

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

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In the Matter of)
)
Streamlining Broadcast EEO)
Rules and Policies, Vacating the) MM Docket No. 96-16
EEO Forfeiture Policy Statement)
and Amending Section 1.80 of the)
Commission's Rules to Include)
EEO Forfeiture Guidelines)

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TO THE COMMISSION

MOTION FOR EXTENSION OF TIME

The Minority Media and Telecommunications Council, on its own behalf and on behalf of numerous other organizations it represents in the above-referenced proceeding,^{1/} respectfully requests an extension of time of two months following the issuance of an order reconsidering and/or clarifying the NPRM.

Yesterday, MMTC and nineteen other organizations filed a Petition for Reconsideration and Clarification of the NPRM. We are unable to develop thorough and meaningful comments without knowing the Commission's goals, the intended scope of the NPRM, and which entities' interests are deemed worthy of attention.

Even were these matters clarified, though, two additional considerations prevent MMTC from preparing its comments by the April 30 deadline.

First, MMTC will be involved in several proceedings which flow from the Telecommunications Act. Unlike the instant proceeding, the Telecommunications Act implementation proceedings must conclude by specified dates; consequently, they are necessarily first in our queue of work.

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^{1/} See National Council of Churches et al. Petition for Reconsideration and Clarification, MM Docket No. 96-16, filed April 11, 1996, at 1.

Second, the NPRM calls for a considerable volume of independent research on, inter alia, the impact and effects of EEO enforcement on large and small stations. MMTTC will attempt to research several issues which the NPRM identifies as critical.^{2/} However, given its very limited resources, MMTTC cannot perform most of its research in-house. Promptly after the issuance of the NPRM, MMTTC contacted several universities and sought students willing to assist with data collection. Unfortunately, since the NPRM had been issued when spring classes were already in session, no qualified students were immediately available. MMTTC did identify three graduate students who will be retained to conduct the research, but they are unavailable until late May due to their class schedules.

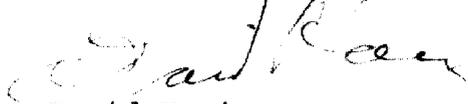
^{2/} MMTTC will examine, inter alia:

- correlations among minority and female employment in the top four job categories; station size; market size; minority representation in the MSA workforce; proposals to undertake training; proposals to participate in job fairs; job turnover rate; job referrals generally; and job referrals from particular types of sources;
- forfeiture levels attaching to large and small stations;
- the extent do state broadcaster association and academic broadcast schools' job fairs include minority and female job candidates;
- the potential impact on minority job-seekers of the use of alternate labor force data by exurban stations;
- the extent of LMAs and duopolies by station size, and the implications of LMAs and duopolies for EEO reporting; and
- the extent to which alumni of Black college broadcasting programs have started their careers at small stations or in small markets.

As the Commission is aware, MMTC has worked on this issue with uncommon diligence for many years. Last year, MMTC went the extra mile, albeit unsuccessfully, to attempt to work out its differences with its opponents in the industry. This request for an extension of time is made solely for the purpose of assisting the Commission in developing a full record and reaching a decision which might harmonize the very different views of the parties.

Accordingly, MMTC respectfully requests that an appropriate extension of time be granted.

Respectfully submitted,



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