

RECEIVED

NOV 15 1996

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

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Television Broadcast)
Service)

TO: The Commission

DOCKET FILE COPY ORIGINAL

OPPOSITION TO REQUEST FOR EXTENSION OF TIME

These opposition comments are filed on behalf of the following: ABC, ALTV, APTS, CBS, Chris Craft, MSTV, NAB, NBC, PBS, and Tribune ("Broadcasters"). Broadcasters oppose the Request to Extend Comment and Reply Comments in the above-captioned proceeding filed by Cohen, Dippell and Everest and any other such petitions for an extension of time. Broadcasters believe that the transition to digital advanced television must begin now. The optimal DTV transmission standard and the planning factors used to allot and assign DTV channels have been under development for nine years. Changes will have to be made to any table that is adopted, but it is critical that the Commission adopt a table as soon as possible, subject to such changes. This course is the only way to ensure that the long-awaited DTV service is licensed in the very near future.

Broadcasters also recognize, however, the importance of providing the critical players in the DTV transition with the opportunity to study fully and to comment meaningfully on the Sixth Further Notice of Proposed Rule Making (FCC 96-207,

No. of Copies rec'd
List ABCDE

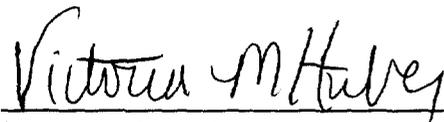
249

released August 14, 1996) ("Notice"). Therefore, Broadcasters urge that, instead of extending the time in which to file all comments, the Commission should accept late filed comments to the Notice and extend the time in which to file reply comments in this proceeding. Particularly with the approach of the holiday season, a reasonable extension of time in which to file reply comments should give all an opportunity to prepare fully developed comments to the Notice. Such an approach should provide for full consideration of the issues, but should not unduly delay the conclusion of this critical proceeding. Therefore, Broadcasters urge that the Commission:

- Deny the motion for an extension of the November 22, 1996 comment deadline;
- Accept late filed comments for a reasonable period following the November 22 deadline; and
- Extend the time to file reply comments in this proceeding to January 10, 1997.

Respectfully submitted,

ASSOCIATION FOR MAXIMUM
SERVICE TELEVISION, INC.



Jonathan D. Blake
Gerard J. Waldron
Ellen P. Goodman
Victoria Huber
Covington & Burling
1201 Pennsylvania Avenue, N.W.
Post Office Box 7566
Washington, D.C. 20044
Phone: (202) 662-6000
Fax: (202) 662-6291
Its Attorneys

ASSOCIATION OF AMERICA'S
PUBLIC TELEVISION STATIONS

/s/ Marilyn Mohrman-Gillis

Marilyn Mohrman-Gillis
General Counsel
Association of America's
Public Television Stations
1350 Connecticut Ave., NW
Washington, DC 20036
Phone: (202) 887-1700
Fax: (202) 293-2422

ABC, INC.

/s/ Sam Antar

Sam Antar
Vice President, Law and Regulation
77 West 66th Street
16th Floor
New York, New York 10023
Phone: (212) 456-6222
Fax: (212) 456-6202

CHRIS-CRAFT INDUSTRIES, INC.

/s/ John C. Siegel

John C. Siegel
Senior Vice President
650 California Street
San Francisco, California 94108
Phone: (415) 249-4405
Fax: (415) 397-1924

ASSOCIATION OF LOCAL
TELEVISION STATIONS, INC.

/s/ James J. Popham

James J. Popham
Vice President & General Counsel
1320 19th Street, N.W.
Suite 300
Washington, D.C. 20036
Phone: (202) 887-1970
Fax: (202) 887-0950

CBS INC.

/s/ Mark W. Johnson

Mark W. Johnson
Associate General Counsel
600 New Hampshire Ave., N.W.
Suite 1200
Washington, D.C. 20037
Phone: (202) 457-4513
Fax: (202) 457-4611

NATIONAL BROADCASTING
COMPANY, INC.

/s/ Michael J. Sherlock

Michael J. Sherlock
Executive Vice President, Technology
30 Rockefeller Plaza
Suite 1022
New York, New York 10112
Phone: (212) 664-4444
Fax: (212) 664-7070

NATIONAL ASSOCIATION OF
BROADCASTERS

/s/ Henry L. Baumann

Henry L. Baumann
Executive Vice President
& General Counsel
1771 N Street, N.W.
Washington, D.C. 20036-2891
Phone: (202) 429-5458
Fax: (202) 429-3526

TRIBUNE BROADCASTING
COMPANY

/s/ Dennis FitzSimons

Dennis FitzSimons
Executive Vice President
435 N. Michigan Avenue
Chicago, Illinois 60611
Phone: (312) 222-9100
Fax: (312) 222-4206

PUBLIC BROADCASTING SERVICE

/s/ Paula A. Jameson

Paula A. Jameson
Senior Vice President,
General Counsel and Secretary
1320 Braddock Place
Alexandria, VA 22314
Phone: (703) 739-5464
Fax: (703) 739-5358

November 15, 1996