

BEFORE THE
Federal Communications Commission MAY 27 1997

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Federal Communications Commission
Office of Secretary

Implementation of Section 304)
of the Telecommunications Act of 1996) CS Docket No. 97-80
)
)
Commercial Availability of)
Navigation Devices)
)

To: The Commission

MOTION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS

Time Warner Entertainment Company, L.P. ("Time Warner"), by its attorneys, hereby requests that the Commission extend the Reply Comment due date in the above-captioned proceeding for 45 days, or until July 31, 1997. Such an extension is warranted for two reasons. First, ITS, the sub-contractor responsible for processing comments, has been woefully behind schedule in compiling a docket listing and making the comments available to the public. As of the close of business last Friday, substantial numbers of comments were still unavailable to the public. Indeed, until today, Time Warner and other interested entities were unable to obtain and review a full docket history and the comments in order to even begin to develop responsive positions for inclusion in their reply comments. As this proceeding is highly complex and there are a diverse array of proposals put forth in the comments, adequate time to review these documents is essential.

Second, this docket is highly technical and presents difficult policy and business issues which will profoundly affect the multichannel video programming delivery industry. Time Warner is hopeful that discussions between various interested parties during this extended reply comment period might lead to the development of a consensus on various

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matters, thus helping to narrow the issues for resolution by the Commission. Moreover, industry participants, including Time Warner, must be afforded additional time to process the multitude of information provided in the comments, and to craft responsive positions. A 30-day response cycle is insufficient to adequately develop responsive positions for the reply comments. An additional 45 days would assist all parties in better responding to the proposals put forth in the comments.

WHEREFORE, Time Warner respectfully, requests an additional 45 days, to July 31, 1997, for all parties to file Reply Comments in this proceeding.

Respectfully submitted,

TIME WARNER ENTERTAINMENT COMPANY, L.P.

By: _____

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Dated: May 27, 1997