

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

In the Matter of)

Promoting Innovation and Competition in the)
Provision of Multichannel Video Programming)
Distribution Services)

) MB Docket No. 14-261
)
)
)



MOTION IN SUPPORT OF NAB’S MOTION FOR EXTENSION OF TIME

The American Cable Association (“ACA”) files this Motion in Support of the Motion for Extension of Time (“Motion”) filed by the National Association of Broadcasters (“NAB”) in this proceeding.¹ NAB requests a thirty (30) day extension to file comments and reply comments in response to the Commission’s Notice of Proposed Rulemaking (“NPRM”) seeking comment on the definition of a multichannel video programming distributor (“MVPD”). If NAB’s Motion is granted, the filing deadlines would be extended to March 19, 2015, for comments, and April 3, 2015, for reply comments.

ACA urges the Commission to grant NAB’s Motion. As NAB points out, the proposals in the NPRM raise a variety of complex public policy, legal and regulatory matters, all of which will have a significant potential impact on television viewers and the MVPD marketplace.² NAB

¹ *Promoting Innovation and Competition in the Provision of Multichannel Video Programming Distributions Services*, National Association of Broadcasters, Motion for Extension of Time, MB Docket No. 14-261 (filed Feb. 6, 2015) (“NAB Motion”).

² NAB Motion at 1.

further emphasizes that interested parties need more time to analyze the issues in the NPRM, gather relevant data and information, and provide ideas to the Commission.³ ACA plans to actively participate in this proceeding, which raises a host of difficult legal and technical issues as do all questions concerning the appropriate regulatory classification of new communications services. ACA agrees that all interested parties should have more than the currently allotted time, which was brief for a rulemaking of this complexity, to prepare detailed filings and provide the Commission with the most complete and well-developed record possible in this complicated and important proceeding.⁴

Moreover, unless NAB's Motion is granted, reply comments will be due March 4, 2015. This deadline overlaps with ACA's annual Washington D.C. Summit, which will take place from March 3-5, 2015, and will be organized by ACA's policy staff and attended by many ACA member companies. ACA and its counsel are small organizations with limited resources that will be otherwise focused on this important association event. It will be difficult for ACA to fully serve its member companies attending its D.C. Summit while simultaneously preparing reply comments for filing with the Commission. Conversely, a reply comment deadline of April 3, 2015, will provide the time necessary for ACA to respond to significant points raised in other comments.

For the foregoing reasons, ACA supports NAB's Motion requesting a thirty (30) day extension of time for all parties to file comments and reply comments in this proceeding.

³ *Id.*

⁴ See, e.g., *Amendment of Parts 2 and 25 of the Commission's Rules to Permit Operation of NGSO FSS Systems in the Ku-Band Frequency Range, Order Extending Reply Comment Period*, 16 FCC Rcd 7070, ¶ 3 (2001) ("We believe that it is in the public interest to decide this matter with the most complete and well-developed record possible.).

Respectfully submitted,

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