

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

In the Matter of)	
)	
2014 Quadrennial Regulatory Review –)	MB Docket No. 14-50
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
2010 Quadrennial Regulatory Review –)	MB Docket No. 09-182
Review of the Commission’s Broadcast)	
Ownership Rules and Other Rules Adopted)	
Pursuant to Section 202 of the)	
Telecommunications Act of 1996)	
)	
Promoting Diversification of Ownership In the)	MB Docket No. 07-294
Broadcasting Services)	

MOTION OF FOR EXTENSION OF TIME

The National Hispanic Media Coalition (“NHMC”), respectfully requests, pursuant to 47 C.F.R. §1.46, a 30-day extension of time to file comments and reply comments responsive to the Federal Communications Commission’s (“FCC” or “Commission”) Public Notice seeking comment on the *Hispanic Television Study* as part of the quadrennial review of media ownership rules and diversity of ownership of broadcast media.¹ Grant of a 30-day extension would result in the comment deadline moving from May 26, 2016 to June 27, 2016, and the reply comment deadline moving

¹ *2014 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; 2010 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; Promoting Diversification of Ownership In the Broadcasting Services*, MB Docket Nos. 14-50, 09-182, 07-294, Public Notice (rel. May 12, 2016) (“Hispanic TV Study Public Notice”).

from June 3, 2016, to July 5, 2016. An extension is needed to permit NHMC to fully examine the complex study and comment on the methodology, results, and peer review report.

The commencement of the *Hispanic Television Study* was first announced on October 24, 2013.² Comment was solicited on the final *Hispanic Television Study* on May 12, 2016 and an initial comment deadline was set for May 26, 2016.³ A period of more than two-and-a-half years – 931 days – elapsed between the announcement and the release of the final study. However, commenters are only provided 14 days to review and evaluate the 86-page study. While it would not be realistic or necessary to expect the Commission to provide the public with a review period equal to the time taken to complete the research, the vast discrepancy in time here is notable as evidence that more time may be required for interested parties to thoroughly review and analyze the final product.

Moreover, it is evident from a cursory review of the study that the significant amount of time required to complete it was likely due, in part, to its complexity. The highly-technical and complex methodology make it even less realistic for interested stakeholders and members of the public to be able to prepare thoughtful and useful comments in only 14 days. The authors describe the study as “rigorous” and “the most comprehensive study to make extensive use of the Commission’s improved Form 323 data.”⁴ The study utilizes no less than five extensive data sets and the authors admit that

² Press Release, Federal Communications Commission, *FCC Announces New Study Examining Hispanic Television Viewing As Part Of Commitment To Encourage Broadcast Diversity* (rel. Oct. 24, 2013).

³ Hispanic TV Study Public Notice.

⁴ Federal Communications Commission, *Hispanic Television Study 1, 2* (May 2016)

organizing and cleaning the voluminous data presented a “significant challenge.”⁵ This complexity was not lost on Octavian Carare, the author of the study’s peer review, who opined that the study’s authors rely on “a new and valuable data set painstakingly assembled using a variety of data sources” and noted that it should be clear that “the effort required to put together the data for this study was quite significant.”⁶ It is unreasonable to expect the public to be able to fully digest and opine on this study in the short period of time granted for comments and reply comments.

Further, it is likely that parties interested in media diversity who may want to comment on this study have been capacity-constrained in recent weeks and days due to comment and reply comment deadlines, and otherwise active dockets, in other proceedings. For instance, reply comments in MB Docket No. 16-42, *Expanding Consumers’ Video Navigation Choices*, were due on May 23, 2016, just days before the comment deadline for the *Hispanic Television Study*.⁷ In that proceeding, issues of media diversity have played a prominent role. The comment period in MB Docket No. 16-41, *Promoting the Availability of Diverse and Independent Sources of Video Programming*, another proceeding where questions of media diversity are raised, spanned much of March and April and the docket remains active.⁸

Finally, extending the reply deadline would not prejudice any party. All parties

(“Hispanic TV Study”).

⁵ Hispanic TV Study at 76.

⁶ Octavian Carare, *Review of the “Hispanic Television Study,”* 1 (May 5, 2016).

⁷ *Expanding Consumers’ Video Navigation Choices; Commercial Availability of Navigation Devices*, MB Docket No. 16-42, CS Docket No. 97-80, Order, FCC 16-18 (rel. Mar. 17, 2016).

⁸ *Promoting the Availability of Diverse and Independent Sources of Video Programming*, Public Notice, MB Docket No. 16-41 (rel. Mar. 1, 2016).

