

GARDNER, CARTON & DOUGLAS

JUL 28 2000

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FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

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30 COUNTRIES

July 28, 2000

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: Request For Extension Of Time of Tennessee Valley Radio, Inc.  
Amendment of Section 73.202(b)-Table of Allotments-FM Broadcast  
Stations (Tullahoma, Tennessee and Madison, Alabama)  
MM Docket No. 00-64, RM-9117**

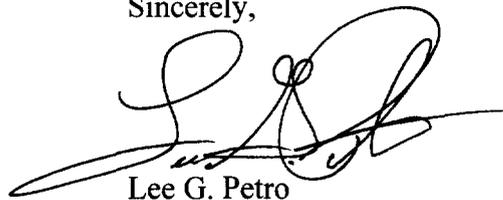
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Dear Ms. Salas:

Transmitted herewith, on behalf of Tennessee Valley Radio, Inc., is an original and four (4) copies of its Request For Extension Of Time in the above-referenced rulemaking proceeding.

Should there be any questions, please contact undersigned counsel.

Sincerely,



Lee G. Petro

Enclosures

DC01/334496.3

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

In the Matter of	)	
	)	
Tennessee Valley Radio, Inc.	)	MM Docket No. 00-64
	)	RM-9117
Amendment of Section 73.202(b), Table of	)	
Allotments, FM Broadcast Stations (Tullahoma	)	
and Madison, Alabama)	)	

To: Chief, Allocations Branch  
Mass Media Bureau

**REQUEST FOR EXTENSION OF TIME**

Tennessee Valley Radio, Inc. ("TVRI"), the licensee of Station WPZM(FM), Tullahoma, Tennessee, by and through its attorneys, hereby requests additional time to respond to the "Motion to Dismiss Rule Making Petition and Strike Reply Comments" ("Motion") filed by STG Media, L.L.C. on July 14, 2000 in the above-referenced proceeding. Additional time is necessary for the following reasons.<sup>1</sup>

First, Counsel for TVRI only became aware of the filing on July 25, 2000, through a July 21, 2000 "FCC Filings" Public Notice included in the FCC's releases of July 24. To date, counsel for TVRI still have not received the service copy, and obtained a copy of the Motion from the FCC's electronic database. This copy reflects that, despite the fact that all correspondence and the previously-filed pleadings in this proceeding prepared by counsel for TVRI, properly list the correct address of "1301 K Street, N.W.," the Certificate of Service attached to the Motion lists counsel for TVRI to be located at "1391 K Street, N.W." Accordingly, additional time is warranted for TVRI to respond to the Motion.

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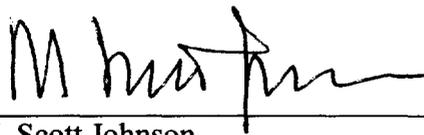
<sup>1</sup> Since the Commission's Rules do not contemplate the filing of pleadings outside of the established filing window, STG Media's pleading is subject to dismissal in accordance with Section 1.415 of the Commission's rules. 47 C.F.R. § 1.415 (1999); *See e.g., Rapid City, South Dakota*, 5 FCC Rcd 1033, n. 1 (1990). However, out of the abundance of caution, the instant request is being filed.

Additional time to respond to the Motion is also necessary as TVRI's consulting engineer retained by TVRI is currently out of town and not due to return until August 7, and further his firm is substantially backlogged due to the impending Low Power Television Filing Window, which runs from July 31 through August 4. See *Public Notice*, DA 00-1383 (June 23, 2000). Although the filing deadline of the engineering data that is required to accompany the short-form application has been delayed until August 31, *Public Notice*, DA 00-1648 (July 25, 2000), counsel for TVRI has been advised by its engineering consultant that an appropriate response to the Motion could not be prepared by his engineering firm prior to August 14, 2000.

Therefore, TVRI respectfully requests additional time to respond to the Motion. Based on the above showings, TVRI believes that an extension through August 14, 2000 is warranted, and will permit it to properly respond to the Motion filed by STG Media, LLC.

Respectfully submitted

**TENNESSEE VALLEY RADIO, INC.**

By:   
M. Scott Johnson

By:   
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(202) 289-1504

Its Attorneys

July 28, 2000  
DC01/339622.1

**CERTIFICATE OF SERVICE**

I, Michelle Brown, a secretary in the law firm of Gardner, Carton & Douglas, certify that I have this 28<sup>th</sup> day of July, 2000 caused to be sent by hand delivery, a copy of the foregoing "Request For Extension Of Time" to the following:

Ms. Sharon P. McDonald\*  
Mass Media Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW – Suite 3-A266  
Washington, D.C. 20554

David G. O'Neil, Esquire  
Rini, Coran & Lancellotta, P.C.  
1350 Connecticut Avenue, N.W.  
Suite 900  
Washington, DC 20036

  
Michelle Brown

\* Indicates Hand Delivery