

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Cross-Ownership of Broadcast Stations and Newspapers)	MM Docket No. 01-235
)	
Newspaper/Radio Cross-Ownership Waiver Policy)	MM Docket No. 96-197
)	

OPPOSITION TO REQUEST FOR EXTENSION OF TIME

The Newspaper Association of American (“NAA”), by its attorneys, hereby opposes the excessive “Request for Extension of Time to File Reply Comments” submitted December 12, 2001 by Consumers Union, Consumer Federation of American, Leadership Conference on Civil Rights, Civil Rights Forum on Communications Policy, Center for Digital Democracy (“CU *et al.*”); Office of Communication, Inc. of United Church of Christ, National Organization for Women, and Media Alliance (“UCC *et al.*”); and the AFL-CIO (collectively, “CU/UCC/AFL”).

As CU/UCC/AFL acknowledge, the review of the newspaper/broadcast cross-ownership ban finally undertaken in this proceeding has been long-delayed. The ban was adopted in 1975 in a media environment that has since been transformed by explosive growth and technological advances, yet has not been re-evaluated in more than a quarter of a century. The Commission’s inquiry into the newspaper/radio waiver policy was commenced five years ago, but has lain dormant since early 1997, when the original comment cycle was concluded. The current rulemaking proceeding is an outgrowth of the 1998 Biennial Review proceeding, which was

initiated at the direction of Congress in March 1998. The “inquiry” phase of that proceeding was not concluded until more than two years later, in May 2000, when the Commission promised to initiate a rulemaking to reexamine the newspaper ban. After another sixteen months, the Commission finally issued its Notice of Proposed Rulemaking in MM Docket No. 01-235, establishing a comment deadline of December 3, 2001 and a reply date of January 7, 2001.

CU/UCC/AFL filed extensive comments in early December, as did NAA and numerous other parties. CU/UCC/AFL hardly can claim to be surprised at the nature or substantiality of the comments filed, and had every opportunity to make their own views known. (CU, for example, filed comments and appendices totaling 236 pages.) They now seek a 39-day extension of time, however, that will more than double the reply period. Indeed, the length of the extension itself would exceed the reply period specified by the Commission in its Notice of Proposed Rulemaking. In support of their request, CU/UCC/AFL cite only the volume of material in the record, the upcoming holidays, and their interest in participating in other FCC proceedings. None of these considerations, NAA submits, can justify the lengthy extension requested.

This proceeding represents the first opportunity for a meaningful review of the counterproductive newspaper/broadcast cross-ownership ban since its adoption and already has been postponed far too long, notwithstanding the explicit mandate of Congress in the Telecommunications Act of 1996, which requires the Commission to review all of its ownership

rules biennially and to modify or eliminate those that cannot be shown to be necessary to serve the public interest in light of competition. CU/UCC/AFL should not be permitted to add yet another layer of delay at this late hour.

Respectfully submitted,

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December 14, 2001

CERTIFICATE OF SERVICE

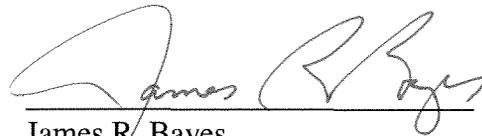
I hereby certify that true copies of the foregoing "Opposition To Request For Extension Of Time" were deposited in the United States mail, first class postage prepaid, on the 14th day of December, 2001, addressed to the following:

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