

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

In the Matter of	)	
	)	
Implementation of Section 11 of the Cable Television Consumer Protection and Competition Act of 1992	)	CS Docket No. 98-82
	)	
Implementation of Cable Act Reform Provisions of the Telecommunications Act of 1996	)	CS Docket No. 96-85
	)	
The Commission's Cable Horizontal and Vertical Ownership Limits and Attribution Rules	)	MM Docket No. 92-264
	)	
Review of the Commission's Regulations Governing Attribution Of Broadcast and Cable/MDS Interests	)	MM Docket No. 94-150
	)	
Review of the Commission's Regulations and Policies Affecting Investment In the Broadcast Industry	)	MM Docket No. 92-51
	)	
Reexamination of the Commission's Cross-Interest Policy	)	MM Docket No. 87-154
	)	

**MOTION FOR EXTENSION OF TIME**

The National Cable & Telecommunications Association ("NCTA"), pursuant to Section 1.46 of the Commission's Rules, respectfully requests a two-week extension of the date for filing reply comments in the above-captioned proceedings, to February 19, 2002.

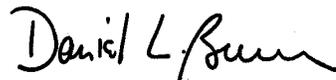
In these proceedings, the Commission is seeking evidence and economic analysis to determine, on remand from the United States Court of Appeals for the District of Columbia Circuit, how best to implement the horizontal and vertical ownership

provisions of the Cable Television Consumer Protection and Competition Act of 1992. In its initial comments, NCTA submitted an economic analysis by Professor Howard Shelanski addressing many of the issues raised in the Notice of Proposed Rulemaking. That analysis showed that changed circumstances in the marketplace have sharply diminished any likelihood that even a large cable multiple system owner will have the ability or the incentive to adversely affect the diversity or flow of programming to consumers, and that ownership limits may therefore do more harm than good.

While several parties submitted economic analyses with similar conclusions, the Consumer Federation of America, et al. filed lengthy comments (224 pages, plus attachments) purporting to demonstrate that stringent ownership caps are necessary to prevent anticompetitive conduct. NCTA intends to provide an analysis addressing and rebutting those comments, but it will not be possible for Professor Shelanski to assist us in completing that analysis within the four-week period established by the Commission for obtaining, reviewing and replying to the initial round of comments. Two additional weeks will enable NCTA to complete reply comments incorporating Professor Shelanski's analysis, which, we believe, will contribute to the record without significantly delaying the completion of this rulemaking proceeding or adversely affecting any parties.

For the foregoing reasons, NCTA requests that the date for filing reply comments be extended by two weeks (plus one day, in light of the President's Day holiday) from February 4, 2002 to February 19, 2002.

Respectfully submitted,

A handwritten signature in black ink that reads "Daniel L. Brenner". The signature is written in a cursive style with a large initial "D".

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