

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

In the Matter of	)	
	)	
Rules and Policies Concerning	)	
Multiple Ownership of Radio Broadcast	)	MM Docket No. 01-317
Stations in Local Markets	)	
	)	
Definition of Radio Markets	)	MM Docket No. 00-244

To: The Chief, Media Bureau

**MOTION FOR EXTENSION OF REPLY COMMENT DEADLINE**

The Office of Communication, Inc. of the United Church of Christ (hereinafter “UCC”),<sup>1</sup> by its attorneys, respectfully requests an extension to file reply comments in the above-reference proceeding pursuant to part 1.46 of the Commission’s rules, 47 CFR § 1.46. UCC will be unable, even with maximum effort, to complete its analyses of the voluminous industry filings made in this proceeding and draft a response by the Commission’s April 24, 2002 deadline. As discussed below, UCC believes there is good cause for the Commission to provide an extension of the deadline in this proceeding and therefore requests the Commission delay the reply comment deadline to May 8, 2002, a two week extension.

UCC is virtually the only party in this proceeding who represents the voice of local commercial radio listeners. A short extension of time is critical to allow members of the public

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<sup>1</sup>The United Church of Christ is a not-for-profit religious organization formed in 1957. It has approximately 1.4 million members who make up over 6,000 congregations in the United States and Puerto Rico. The Office of Communication, Inc. of the United Church of Christ is responsible for developing the Church’s policy towards mass media. UCC has actively defended the public’s rights in the communications filed for over 30 years. UCC has also participated in numerous FCC and judicial proceedings, representing the rights of the viewing and listening public.

to fully participate in this proceeding. Industry parties in this proceeding filed approximately 1,500 pages of comments. In addition to presenting a significant number of legal arguments on the statutory framework governing local radio ownership, industry parties included detailed economic analyses and factual presentations on the extensive array of issues relating to diversity and competition in local radio markets.<sup>2</sup> Reviewing and responding to these filings in a comprehensive manner requires significant time and resources. Furthermore, denying the public's ability to challenge assertions made by industry parties would seriously hinder the Commission's ability to sort through the facts in an era when the Commission is emphasizing its desire to make decisions based on a comprehensive record.

In undertaking the effort to represent the public's interest in numerous other Commission proceedings, UCC and its counsel, the Institute for Public Representation ("IPR"), have significant limits on their resources that prevent them from responding by the deadline. For example, IPR is currently in the process of drafting substantial comments for submission in the Commission's proceeding to reassess the Universal Service Fund ("USF") contribution mechanism, which are due on April 22, 2002, two days before the current due date for reply comments in the instant proceeding.<sup>3</sup> In addition, earlier this week, IPR filed extensive

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<sup>2</sup> For example, Clear Channel Communications Inc. submitted an econometric study measuring the effect of radio ownership consolidation on advertising prices and available formats, Viacom Inc. submitted a study that looks at the connection between diversity of ownership and other forms of broadcast diversity as well as an economic study on product and geographic market definition and the National Association of Broadcasters also submitted three studies on format diversity, volatility in radio market shares, and independent radio voices in radio markets.

<sup>3</sup> See *Federal-State Joint Board on Universal Service, 1998 Biennial Regulatory Review – Streamlined Contributor Reporting Requirements Associated with Administration of Telecommunications Relay Service, North American Numbering Plan, Local Number Portability, and Universal Service Support Mechanisms, Telecommunications Services for Individuals with Hearing and Speech Disabilities, and the Americans with Disabilities Act of 1990,*

comments on the FCC's proposed Equal Employment Opportunity rules.<sup>4</sup>

A short delay of two weeks will not prejudice this proceeding. An extension of the reply comment filing period is needed for the intensive amount of analysis to be conducted and for UCC to complete its reply. Furthermore, UCC believes that all commenters would benefit from an extension of time permitting a careful analysis of commenters' proposed options for addressing station combinations. An extension of the reply comment filing deadline will not prejudice any party and will serve the interests of informed decision-making.

Accordingly, UCC respectfully requests that the Commission extend the reply comment deadline in the above-captioned dockets to May 8, 2002. In order to adequately plan for our response, UCC also requests that the Commission make a decision as soon as possible.

Respectfully submitted,

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*Administration of the North American Numbering Plan and North American Numbering Plan Cost Recovery Contribution Factor and Fund Size, Number Resource Optimization, Telephone Number Portability, Truth-in-Billing and Billing Format, Further Notice of Proposed Rulemaking and Report and Order, CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200, 95-116, 98-170, FCC 02-43 (rel. Feb. 26, 2002).*

<sup>4</sup>See Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies, Second Notice of Proposed Rulemaking, MM Docket No. 98-204, FCC 01-363 (rel. Dec. 21, 2001).

/s/ Christopher R. Day  
Christopher R. Day  
Angela J. Campbell  
Institute for Public Representation  
Georgetown University Law Center  
600 New Jersey Avenue, NW  
Suite 312  
Washington, DC 20001  
Telephone: (202) 662-9543

Counsel for the Office of Communication, Inc.  
of the United Church of Christ

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