

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
2002 Biennial Regulatory Review – Review of)	MM Docket No. 02-277
the Commission’s Broadcast Ownership Rules)	
and Other Rules Adopted Pursuant to Section 202)	
of the Telecommunications Act of 1996)	
)	
Cross-Ownership of Braodcast Stations and)	MM Docket No. 01-235
Newspapers)	
)	
Rule and Policies Concerning Multiple Ownership)	
Of Radio Broadcast Stations in Local Markets)	
)	
Definition of Radio Markets)	MM Docket No. 00-244

To: The Commission and Chief, Mass Media Bureau:

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS AND REPLY
COMMENTS

National Organization for Women and Office of Communication, Inc. of United Church of Christ (hereinafter “NOW *et al.*”) respectfully request an extension to file comments and reply comments in the above-referenced docket pursuant to part 1.46 of the Commission’s rules, 47 C.F.R. § 1.46. The December 2, 2002 deadline established by the Commission does not provide sufficient time to effectively analyze and comment upon all of the issues and data provided in the proposed rulemaking. Therefore, NOW *et al.* request the Commission to begin the comment period after full disclosure of underlying study data requested by letter dated October 8, 2002, for a period of four months (120 days) and extend the reply comment period to two months (60 days).

The NPRM is a massive rulemaking which combines multiple proposals, contains a dozen studies, seeks comment on specific questions as well as broader questions of policy and

rule integration, and requires commenters to perform extensive research and analysis. In order to begin this enormous undertaking, other commenters requested, via a letter dated Oct. 8, 2002, full disclosure of the underlying data used by the Commission's Media Ownership Task Force in developing the twelve studies released on October 1, 2002. Without this information, effective analysis and meaningful comment is impossible.

The extensive scope of these issues, sheer volume of data, and unprecedented potential impact require the Commission to grant this extension. Without the underlying data of the studies and adequate time to effectively analyze the data and its relationship to the rules, *NOW et al.* cannot begin to provide meaningful comments. The Commission clearly determined that the ramifications of this issue warranted the creation of a Media Ownership Task Force to carefully study the issue for almost a year. This request for an extension will give the public *only one-third* the time the Commission took to look into these important issues. As Commissioner Michael J. Copps has observed, “[t]here is the potential in the ultimate disposition of this issue to remake our entire media landscape” and “it is far more important that we get this done right than that we get it done quickly.” *Concurring Statement of Commissioner Michael J. Copps.*

Failure to grant an extension of time will undermine the public's ability to fully participate in the rulemaking process. Reviewing and responding to the important issues raised by the NPRM require significant time and resources. *NOW et al.* lack the resources that larger networks, newspaper publishers, cable companies and broadcasters have to devote to preparing meaningful comments under extraordinary deadlines. Accordingly, without an extension of time, groups with larger resources will be able to dominate the public comment period. An extension of time will permit full public participation leading to better decision-making and a greater likelihood that the rules will withstand judicial scrutiny.

Accordingly, NOW *et al.* request that the Commission extend the comment and reply comment periods in the above-captioned dockets to 120 and 60 days, respectively, and officially begin the comment period after the Commission fully releases the data underlying its twelve ownership studies. In the event that the comments received are extensive in scope and nature, NOW *et al.* reserve the right to seek additional time for the reply period.

Respectfully submitted,

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