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Before the
Federal Communications Commission
Washington, DC

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Federal Communications Commission
Office of Secretary

In the Matter of)
Amendment of Section 73.202(b),) MM Docket No. 00-148
Table of Allotments,) RM-9939
FM Broadcast Stations.) RM-10198
(Quanah, Texas, *et al.*))

Filed With: **Office of the Secretary**

Directed to: **The Commission**

REPLY TO OPPOSITION TO MOTION FOR EXTENSION OF TIME

J. & J. Fritz Media, Ltd. ("Fritz"), by its attorney, hereby respectfully submits its Reply to the "Opposition to 'Motion for Extension of Time'" filed by Rawhide Radio, LLC, Capstar TX Limited Partnership, CCB Texas Licenses, L.P., and Clear Channel Broadcasting Licenses, L.P. ("Joint Parties") on July 12, 2004, in the above-captioned proceeding. With respect thereto, the following is stated:

The main thrust of the Joint Parties' objection to the requested extension of time appears to be that the motion was submitted four days prior to the due date for a response rather than seven. The Joint Parties have not shown, however, how they were prejudiced, or even affected in any way, by this fact. The Joint Parties clearly have not been prevented from commenting on the requested extension of time, and they have acknowledged that the Commission's rules do provide for grant of motions of extension of time filed within seven days of a due date.

The Joint Parties also object generally to an extension of time for submission of an Opposition in this proceeding. It must be noted, however, that the extension request to which Fritz was a party was for the brief period of only two weeks, and its "Opposition to Application for Review" has been submitted within the time period requested. Once again, the Joint Parties

have not shown how they were prejudiced in any way by this brief delay. The Joint Parties will still have the full opportunity to file a "Reply to Opposition to Application for Review," just as they already had on July 19, 2004 with respect to the "Opposition of Charles Crawford to Application for Review." At this point in time, the instant proceeding has been pending for approximately four years, and the additional two weeks clearly will not have any appreciable impact on the overall processing time of the proceeding. Moreover, in this case, as noted above, another opposition to the Joint Parties' Application for Review was submitted by Charles Crawford. The Commission's staff must necessarily expend time in considering this Opposition together with the Application for Review. Therefore, the fact that Fritz's Opposition was submitted shortly thereafter rather than on the same day as the Crawford Opposition can have no discernable effect on the overall processing time that will be needed, since it would not be possible for the Commission instantly to review, analyze, and issue a decision with regard to the issues presented in this proceeding. The public interest in having a complete record and weighing all relevant factors prior to coming to a decision clearly outweighs any incremental delay which might be caused, if any, by the brief extension of time requested.

Furthermore, as noted in the Motion, the Joint Parties' Application for Review was massive in size, and the time required to review and analyze it was substantial. The Joint Parties acknowledge that the Application for Review contained some 347 pages but state that the bulk of this material was old and previously submitted, with "minor updates." Opposition to Motion for Extension of Time at ¶ 3. It is those so-called "minor updates" that are the crux of the issue, however, and even those had to be studied. Obviously, counsel for Fritz was required to review the entire submission to determine what those updates might be, how "minor" they were, and what new material might be included with the old. It is therefore largely irrelevant to the amount

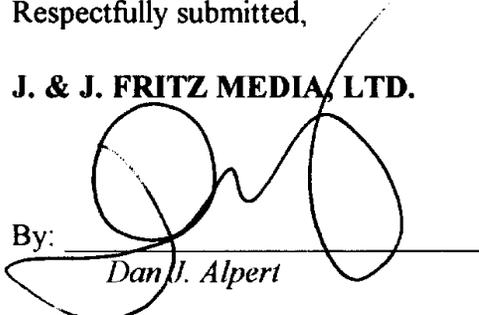
of time required that some of the materials had been submitted previously.

WHEREFORE, the premises considered, Fritz hereby respectfully requests that the Motion for Extension of Time be granted and that its Opposition to Application for Review filed on July 20, 2004, be accepted and considered in this proceeding.

Respectfully submitted,

J. & J. FRITZ MEDIA, LTD.

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By: 

Dan J. Alpert

July 22, 2004

Its Attorney

CERTIFICATE OF SERVICE

I, Dan J. Alpert, do hereby certify that on this 22th day of July, 2004, I caused copies of the foregoing "Reply to Opposition to Motion for Extension of Time" to be mailed, first class postage prepaid, addressed to the following persons:

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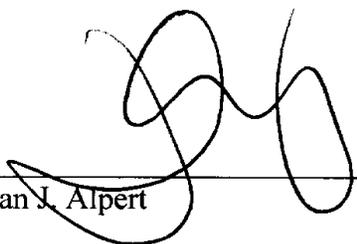
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