

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

In the Matter of

Inquiry Required by the Satellite Home Viewer  
Extension and Reauthorization Act on Rules  
Affecting Competition in the Television  
Marketplace

To: Secretary, Federal Communications Commission

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Federal Communication Commission  
Bureau / Office

REQUEST FOR EXTENSION OF TIME

The Walt Disney Company ("TWDC"), ESPN (80% owned by TWDC), Disney ABC Cable Networks Group (including The Disney Channel, ABC Family, Toon Disney and SOAPnet), The ABC Television Network and the ABC-owned television stations (hereinafter collectively referred to as "Disney") respectfully request that the Federal Communications Commission ("Commission") extend the reply comment filing deadline in the above captioned proceeding to April 15, 2005.

On January 25, 2005, the Commission established deadlines of March 1 and March 16, 2005 for the submission of comments and reply comments on the rules affecting competition in the television marketplace as mandated by the Satellite Home Viewer Extension and Reauthorization Act ("SHVERA"). In order to prepare a detailed reply to the issues raised in the comments of the cable interests, an extension of the reply comment filing deadline is necessary. The comments submitted by the Joint Cable Commenters include a study on retransmission consent prepared by William P. Rogerson, Professor of Economics at Northwestern University. Disney has retained an economist and needs additional time for its economist to prepare a substantive analysis and refutation of the conclusions presented in the study. Without an extension, there would be only 15 days between the filing of the comments and the reply comment deadline. An extension of the reply comment deadline until April 15,

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will enable Disney to provide a more complete discussion and analysis of this study and the issues presented in the comments without needlessly delaying the proceeding.

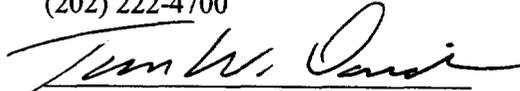
Disney submits that the extension sought is not unreasonable and will not unduly prejudice or harm the Commission's ability to meet its statutory obligation to issue a report to Congress by September 8, 2005. Rather, grant of the extension will help ensure complete responses to the comments submitted thus far and enable the Commission to develop a full record upon which to base its report to Congress.

For the foregoing reasons, Disney respectfully requests that the Commission extend the deadline for filing reply comments in the proceeding to April 15, 2005.

Respectfully submitted,



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March 8, 2005

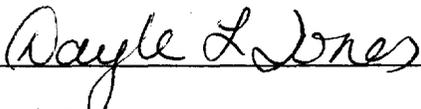
**CERTIFICATE OF SERVICE**

I, Dayle Jones, of Akin Gump Strauss Hauer & Feld, L.L.P., certify that a copy of the foregoing **Request for Extension of Time** on behalf of The Walt Disney Company, was served via hand delivery, except where indicated otherwise, on this 8th day of March, 2005, upon the following:

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