

REC Networks - MM Docket 99-25 – Opposition to SRG

**Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the matter of)
)
) MM Docket 99-25
Creation of a Low Power Radio Service)
)

**OPPOSITION TO
STATION RESOURCE GROUP
MOTION FOR EXTENSION OF TIME**

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool¹. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas.

2. Before the Commission is a Motion for Extension of Time ("SRG Motion") by Station Resource Group ("SRG")² and supporting comments and an additional Motion for Extension of Time ("NPR Motion") filed by National Public Radio ("NPR")³.

¹ - <http://www.recnet.com/lpfminfo>

² - Station Resource Group, Motion for Extension of Time, MM Docket 99-25 at 1 (July 29, 2005)

³ - Comments of National Public Radio and Motion for Extension of Time ("NPR Petition"), MM Docket 99-25 at 1 (August 2, 2005)

REC Networks - MM Docket 99-25 – Opposition to SRG

3. In the SRG Motion, SRG requests an additional 30 day extension of time to permit it to obtain additional input from its membership at its annual organizational meetings.

4. In the NPR Motion, NPR supports the SRG motion for an extension of time and NPR also points out that a 15-day reply comment period contemplates a number of far reaching changes to longstanding Commission rules and, as in other phases of this proceeding, a large number of comments are likely to be filed⁴.

5. In this specific proceeding, we had an unusually long period of time between the time that the Notice of Proposed Rulemaking⁵ was originally issued by the Commission and the time that it appeared in the Federal Register. Organizations like SRG and NPR have had plenty of time during this period to consult with their membership and affiliates to prepare their comments.

6. To show that there was plenty of time to prepare comments in this proceeding, REC filed its formal comments⁶ in this proceeding on the day after it was published in the Federal Register⁷. All other parties to this proceeding, including NPR

⁴ - NPR Petition at 2.

⁵ - Second Order on Reconsideration and Further Notice of Proposed Rulemaking, MM Docket 99-25, FCC 05-75, Released March 17, 2005.

⁶ - Comments of REC Networks, MM Docket 99-25 (July 8, 2005).

⁷ - Federal Register, Vol. 70, No. 129 at 39217 (July 7, 2005).

REC Networks - MM Docket 99-25 – Opposition to SRG

and SRG have had just under a 5-month period to develop their position and prepare their comments on this proceeding.

7. REC does agree in part with NPR to the extent of the time of the Reply Comment period. The large number of comments that will be received will need to be reviewed by REC, NPR and other parties to this proceeding. We feel that it is reasonable for NPR to ask for an extension of the Reply Comment period from 15 days to 30 days. This would make the proposed Reply Comment period on September 7, 2005. However, due to the Labor Day holiday falling during this week, we would feel that it is appropriate to extend this period to Friday September 9, 2005.

8. Therefore, we urge the Commission to **DENY** the petition of Station Resource Group to extend the Comment Period and **GRANT IN PART** the petition by National Public Radio to the extent that the Reply Comment period is **EXTENDED** to September 9, 2005.

Respectfully Submitted,

/S/ _____
Rich Eyre for
REC Networks
P O Box 40816
Mesa, AZ 85274-0816
rec@recnet.com
<http://www.recnet.com>