

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

In the Matter of	)	
	)	
<b>COMMERCIAL RADIO SERVICE, INC.</b>	)	<b>EB Docket No. 06-168</b>
	)	
Licensee of Private Land Mobile Stations	)	File No. EB-06-IH-1362
WNDS861, Reelsville, Indiana; WNIL729,	)	NAL Acct. No. 200632080166
Paxton, Indiana; WPCJ772, West Terre	)	
Haute, Indiana; and WPNU312, Greencastle,	)	
Indiana/West Terre Haute, Indiana	)	
	)	
Licensee of Commercial Land Mobile Station	)	
WNGE348, West Terre Haute, Indiana	)	
	)	
<b>TIMOTHY M. DOTY</b>	)	
	)	
Licensee of General Radiotelephone Operator	)	
License PG1814366; and Amateur Radio	)	
Operator and Licensee of Amateur Radio	)	
Station WB9MDC, West Terre Haute, Indiana	)	

To: Administrative Law Judge Arthur I. Steinberg

**MOTION FOR EXTENSION OF TIME TO  
RESPOND TO DISCOVERY REQUESTS**

Commercial Radio Service, Inc. ("CRS"), by its attorneys, and pursuant to §§ 1.291(a)(3), 1.298(a), and 1.323(b) of the Commission's Rules, hereby respectfully requests that the Presiding Officer extend until October 13, 2006 the time within which CRS may respond to the requests of the Enforcement Bureau ("Bureau") for (1) the admission of facts and genuineness of documents, (2) the production of documents, and (3) answers to interrogatories. In support thereof, the following is respectfully submitted:

Considering it had gross receipts of less than \$400,000 in 2005, CRS is concerned that it may lack the financial resources to engage in protracted litigation. Accordingly, CRS is engaged in discussions with the Bureau with an eye towards avoiding an expensive and time-consuming

evidentiary hearing. CRS seeks an extension of the response deadlines to permit discussions with the Bureau to continue without incurring the type of expense it seeks to avoid.

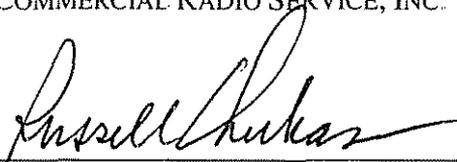
Grant of this motion will serve the public interest by promoting the possible resolution of the issues and by postponing the need for the expenditure of time and resources by CRS until such time as may actually be necessary. *Cf., Judware v. Verizon Communications, Inc.*, 20 FCC Rcd 4069, 4070 (Enf. Bur. 2005).

Counsel for the Bureau and Timothy M. Doty have been notified of the filing of this motion. The Bureau has authorized us to state that it will interpose no objection to the grant of the motion.

For all the foregoing reasons, CRS respectfully requests the Presiding Officer to grant this motion and set October 13, 2006 as the deadline for responding to the Bureau's discovery requests.

Respectfully submitted,

COMMERCIAL RADIO SERVICE, INC.

By:   
\_\_\_\_\_  
Russell D. Lukas  
Elizabeth R. Sachs

*Its Attorneys*

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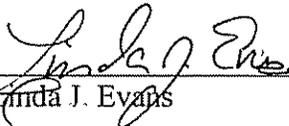
October 3, 2006

**CERTIFICATE OF SERVICE**

I, Linda J. Evans, a secretary in the law office of Lukas, Nace, Gutierrez & Sachs, Chartered, hereby certify that I have, on this 3<sup>rd</sup> day of October, 2006, caused to be mailed, first-class, postage prepaid, a copy of the foregoing Motion for Extension of Time to Respond to Discovery Requests to the following:

Gary Schonman  
William Knowles-Kellett  
Investigations and Hearings Division  
Enforcement Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room 4-C330  
Washington, D.C. 20554

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Lorretta K. Tobin  
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1301 Connecticut Ave., N.W., Ste. 450  
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*Counsel for Timothy M. Doty*

  
\_\_\_\_\_  
Linda J. Evans