

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

In the matter of)
)
Leased Commercial Access) MB Docket No. 07-42
)
Development of Competition and Diversity)

To: The Media Bureau

**MOTION FOR EXTENSION OF TIME TO
FILE COMMENTS AND REPLY COMMENTS
OF
NATIONAL ALLIANCE OF MEDIA ARTS AND CULTURE,
UNITED CHURCH OF CHRIST OFFICE OF COMMUNICATION, INC.,
AND
FREE PRESS**

Media Access Project, on behalf of the National Alliance of Media Arts and Culture (NAMAC), the United Church of Christ Office of Communication, Inc. (UCC), and Free Press (FP) (collectively, "NAMAC, *et al.*"), files this request for a brief extension of time to file comments and reply comments in the above captioned proceeding. For the reasons set forth below, NAMAC, *et al.*, ask for an extension of one week for initial comments and an extension of three weeks for reply comments. If the Bureau grants this request, comments would be due on September 11, 2007, with replies due October 12, 2007.

ARGUMENT

On June 15, 2007, the Commission released the above captioned *Notice of Proposed Rulemaking* reexamining the effectiveness of its leased access and carriage complaint regulations. Notice did not appear in the *Federal Register* until July 18,

2007. As a result, interested parties must file comments by September 4, the Tuesday following Labor Day. Reply comments are due September 21, immediately before the Jewish holiday of Yom Kippur.

Because of long-planned vacations, it has proven difficult to gather information and coordinate among interested parties. An additional week for initial comments will greatly assist Media Access Project staff in preparing useful comments for this proceeding and avoid undue hardship for respondents. NAMC, *et al.*, therefore request that the Commission defer the deadline for comments until September 11, 2007.

Similarly, requiring parties to file reply comments the day before the Jewish holiday of Yom Kippur imposes significant hardship for Media Access Project staff and other interested parties. Furthermore, NAMAC, *et al.*, anticipate that interested parties will file detailed comments that will require significant analysis. NAMAC, *et al.*, therefore request that the Bureau extend the deadline for reply comments to October 12, 2007. If the Commission grants the extension for comments requested above, moving the reply comments to this date will provide 30 days for reply, rather than the 20 days between comments and reply comments initially ordered by the Commission. This additional ten days for replies is both reasonable and necessary. As the comments already filed suggest, the initial comments will likely contain useful economic information that interested parties will need to aggregate and analyze for replies.¹

The minimal delay so early in the proceeding will cause virtually no hardship to

¹This extension will also move the reply date past the Jewish holidays of Succot (September 22-28) and Simchat Torah (October 4-5).

other interested parties. Nor will it disrupt the orderly business of the Bureau or substantially delay the outcome of this proceeding. Grant of the request, however, will ease significant hardship on respondents and allow interested party to create a more complete record for the Commission's review.

CONCLUSION

WHEREFORE, for the reasons set forth above, NAMAC, *et al.*, respectfully request that the Bureau extend the date for initial comments in this proceeding until September 11, 2007, and extend the date for reply comments to October 12, 2007.

Respectfully submitted,

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