

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

In the Matter of)	
)	
2006 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996)	MB Docket No. 06-121
)	
)	
2002 Biennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996)	MB Docket No. 02-277
)	
)	
Cross-Ownership of Broadcast Stations and Newspapers)	MM Docket No. 01-235
)	
Rules and Policies Concerning Multiple Ownership of Radio Radio Broadcast Stations in Local Markets)	MM Docket No. 01-317
)	
)	
Definition of Radio Markets)	MM Docket No. 00-244
)	
)	
Ways to Further Section 257 Mandate and To Build on Earlier Studies)	MB Docket No. 04-228
)	
To the Commission		

MOTION FOR EXTENSION OF TIME

The Diversity and Competition Supporters (DCS)¹, pursuant to 47 C.F.R. §1.46(b), respectfully request the Commission to extend from October 15, 2007 to November 21, 2007 the deadline for filing reply comments in response to the Second Further Notice of Proposed Rulemaking (“Second Further NPRM”).²

¹ The 29 organizations comprising the Diversity and Competition Supporters are set out in the Appendix to DCS’ Initial Comments in Response to the Second Further Notice of Proposed Rulemaking, MB Docket No. 06-121 et al. (October 1, 2007) (“DCS 2007 Initial Comments on the Second Further NPRM”).

² 2006 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 06-121 et al. (Second Further Notice of Proposed Rulemaking), FCC 07-136 (released August 1, 2007) (“Second Further NPRM”).

DCS' Initial Comments on the Second Further NPRM discuss 38 proposals, including 28 the Commission could implement now.³ This document is the only place in the record where so many viable means of addressing minority ownership are developed all in one place.

Since the details of minority ownership policy are unfamiliar to most media ownership stakeholders, it is understandable that only seven comments were filed in response to the Second Further NPRM.⁴ That is hardly sufficient to support findings and conclusions.

Fortunately, over the past week, DCS has been contacted by several interested parties, particularly broadcast companies, that desire to thoroughly review DCS' Initial Comments, decide which proposals they can support, and submit reply comments.⁵ However, the October 15 deadline for reply comments in response to the Second Further NPRM is going to be very difficult for parties to meet. On October 22, just a week later, the parties face a deadline for comments on ten media ownership studies comprising nearly 700 pages, as well as extensive background data and peer reviews.⁶ DCS fears that many parties, faced with two prodigious tasks with deadlines a week apart, will forego the minority ownership track of the proceeding and focus only on the studies, most of which go to the core of broadcasters' business needs.

³ DCS Initial Comments on the Second Further NPRM, p. 1.

⁴ DCS Initial Comments on Second Further NPRM; Comments of Entravision Holdings, LLC (filed October 1, 2007); Comments of the National Association of Broadcasters (filed October 1, 2007); Comments of the National Association of Black Owned Broadcasters (filed October 1, 2007); Comments the Office of Communication of the United Church of Christ, Inc. et al. (October 1, 2007); Comments of Consumers Union et al. (October 1, 2007); Comments of Clear Channel Communications, Inc. (October 1, 2007).

⁵ The concurrence of a wide variety of stakeholders is vital to sustainable decisionmaking on minority ownership. Broad consensus on certain proposals is achievable: witness, for example, the endorsement this date of DCS' Proposal #35 (Relaxation Of The Grandfathered Cluster Transfer Deadline For Cluster Purchasers Who Will Resell Stations To Small Businesses (DCS Initial Comments on Further NPRM, pp. 40-41)) by 48 parties, including 21 radio broadcast companies, five financial institutions and capital providers, 16 media brokerages and six public interest and civil rights organizations. See Reply Comments of Alta Communications, Inc. et al. on Petition for Rulemaking of the Minority Media and Telecommunications Council to Facilitate the Entry of Small Businesses Into Local Radio Markets, RM-11388 (filed October 5, 2007).

⁶ See Public Notice, Media Bureau Extends Filing Deadlines for Comments on Media Ownership Studies, MB Dockets 06-121 et al., DA 07-4097 (released September 28, 2007).

DCS also needs an extension of time in its own right, as it needs to file thorough reply comments that will address in detail some parties' substantive and technical objections to some of the minority ownership proposals. DCS will talk through its proposals with dozens of other parties. DCS will also file supplemental pleadings addressing constitutional and statutory issues, submit the declarations of two dozen minority broadcasters, and provide the results of its survey of the minority broadcast financial marketplace.⁷

DCS offers the date of November 21, 2007 because that date falls 30 days after the October 22, 2007 deadline for comments on the media ownership studies, and thus would allow a reasonable window during which the parties can focus primarily on the minority ownership track of this proceeding.

Wherefore, for the reasons stated above, the Commission should grant an extension of time to November 21, 2007 for filing reply comments.

Respectfully submitted,

David Honig

David Honig
Executive Director
Minority Media and Telecommunications Council
3636 16th Street, N.W.
Suite B-366
Washington, D.C. 20010
(202) 332-7005
dhonig@crosslink.net
Counsel for the Diversity and Competition Supporters

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⁷ See DCS Initial Comments on Second Further NPRM, p. 2.