

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Review of the Commission’s Program)	MB Docket No. 07-198
Access Rules and Examination of)	
Programming Tying Arrangements)	

MOTION FOR EXTENSION OF TIME

Fox Entertainment Group, Inc. and Fox Television Holdings, Inc. (together, “Fox”) and Viacom Inc. (“Viacom”), pursuant to Section 1.46(b) of the Commission’s rules, 47 C.F.R. § 1.46(b), respectfully request that the Commission extend the time for filing reply comments in the above-captioned proceeding by 30 days, until February 21, 2008.¹ Reply comments are currently due January 22, 2008.² Extending the deadline for filing reply comments will ensure that the Commission receives full and informed responses to the issues raised in this rulemaking proceeding and that affected parties have a meaningful opportunity to develop a complete record for the Commission’s consideration.

On November 20, 2007, the Commission extended the comment and reply comment deadlines in this proceeding.³ While that extension provided parties with adequate time to prepare initial comments and supporting economic studies, the extension nonetheless retained a short interval between the comment and reply comment deadlines. Given the volume of opening

¹ See *In re Review of the Commission’s Program Access Rules and Examination of Programming Tying Arrangements*, Notice of Proposed Rulemaking, MB Docket No. 07-198 (rel. Oct. 1, 2007) (“*Notice*”).

² See *Extension of Time to File Comments and Reply Comments on the Review of the Commission’s Program Access Rules and Examination of Programming Tying Arrangements*, Public Notice, DA 07-4688, MB Docket No. 07-198 (rel. Nov. 20, 2007).

³ See *id.*

comments filed (more than two dozen pleadings and appendices totaling in excess of 1,000 pages), an extension of the reply deadline is necessary to ensure that parties have a reasonable opportunity to prepare responses. The current deadline makes it very difficult for parties to review all of the comments and expert reports and prepare comprehensive and fully responsive reply comments, possibly including additional expert reports.

In addition, because the comment due date fell on a Friday, and because the comments were filed electronically, the vast majority of the pleadings filed in this proceeding were not available for interested parties to access via the Commission's website until the following Monday. Thus, the 18-day reply period contemplated by the Commission has actually been reduced to just 14 days, an insufficient amount of time in light of the number of comments filed and the complex, fact-intensive issues raised in this proceeding.

Given these circumstances, Viacom and Fox respectfully request a 30-day extension (until February 21, 2008) of the deadline for the filing of reply comments in this proceeding.⁴ Grant of the requested brief extension would not cause any harm or prejudice to the Commission, any interested party or any member of the public. Rather, this extension will serve the public interest by facilitating the submission of meaningful reply comments, which in turn will furnish the Commission with a more thorough and informative record on which to base its decision.

⁴ Fox and Viacom support the request for a 30-day extension of the reply deadline filed by The Walt Disney Company ("Disney") on January 8, 2007. As Disney points out, grant of a 30-day extension would be consistent with Commission action in a number of similar rulemaking proceedings. *See, e.g., In re A La Carte and Themed Programming and Pricing Options for Programming Distribution on Cable Television and Direct Broadcast Satellite Systems*, Order, MB Docket No. 07-204 (rel. July 24, 2004) (extending reply comment period from 15 to 30 days); *In re Leased Commercial Access; Development of Competition and Diversity in Video Programming Distribution and Carriage*, Public Notice, DA 07-3308, MB Docket No. 07-42 (rel. July 20, 2007) (announcing 65-day reply comment period); *In re Exclusive Service Contracts for Provision of Video Services in Multiple Dwelling Units and Other Real Estate Developments*, Notice of Proposed Rulemaking, MB Docket No. 07-51 (rel. Mar. 27, 2007) (providing for 30-day reply comment period).

Respectfully submitted,

FOX ENTERTAINMENT GROUP, INC.
FOX TELEVISION HOLDINGS, INC.
VIACOM INC.

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