

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

In the Matter of)
)
Broadcast Localism) MM Docket No. 04-233
)

To: The Commission

MOTION FOR EXTENSION OF TIME

Introduction

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, National Public Radio, Inc. ("NPR"), the Association of Public Television Stations ("APTS"), the Public Broadcasting Service ("PBS") [(the "Public Broadcasting National Organizations" or "PBNOs")] respectfully request an extension of the deadline for filing comments and reply comments in this proceeding.¹ The current deadlines for comments and reply comments are March 14, 2008 and April 14, 2008, respectively.² As set forth below, the PBNOs believe there is good cause for the Commission to extend the comment filing deadline to and including April 28, 2008, and the reply comment filing deadline to and including June 11, 2008.

NPR is a nonprofit membership corporation that produces, acquires, and distributes news, information, and cultural programming and represents the interests of more than 800

¹ See In the Matter of Broadcast Localism, Report on Broadcast Localism and Notice of Proposed Rulemaking, MM Docket No. 04-233, rel. Jan. 24, 2008 [hereinafter "Report and NPRM"].

² See 73 Fed. Reg. 8255 (February 13, 2008).

noncommercial educational ("NCE") stations nationwide, themselves significant producers of local, regional and national programming.

APTS is a non-profit organization whose membership comprises the licensees of nearly all of the nation's CPB-qualified noncommercial educational television stations. The APTS mission is to support the continued growth and development of a strong and financially sound noncommercial television service for the American public.

PBS is a media enterprise that serves 355 public noncommercial television stations and reaches nearly 73 million people each week through on-air and online content. A trusted community resource, PBS uses the power of noncommercial television, the Internet and other media to enrich the lives of all Americans through quality programs and education services.

The Requested Extension Is In the Public Interest

While extensions of time are not routinely granted,³ extending the comment and reply comment deadlines in this case will enable the PBNOs to (1) review and fully assess the Report and the extensive record underlying it, (2) analyze the numerous regulatory proposals set forth in the NPRM, (3) consult with and gather input from our respective members, (4) seek to develop a consensus among our respective memberships and other industry participants in favor of specific measures that might best achieve the goal of enhancing broadcast localism, and (5) prepare and file comments and reply comments in this proceeding. In these circumstances, a modest delay in the comment and reply comment cycle will facilitate the development of a more complete record without prejudice to the Commission or any interested party.

The Report synthesizes a voluminous record, comprising more than 83,000 written submissions to date and six field hearings, during which 86 formal presentations and remarks

³ 47 C.F.R. § 1.46(a).

were offered and the testimony of 421 additional participants was received.⁴ The NPRM draws on that record to propose a number of far-reaching regulatory initiatives amounting to a comprehensive re-regulation of the radio and television broadcast industries, including NCE broadcasting. Because the PBNOs and their members constitute the foundation of public broadcasting in the United States, they will be materially affected by the outcome of this proceeding.

The PBNOs require additional time to engage in a thorough evaluation of the Commission's significant proposals and their impact on public broadcasting, to consult with the many hundreds of affected public radio and public television stations, and to prepare comments on this evaluation and consultation process. As part of this process, the PBNOs anticipate seeking consensus among our members and other interested industry groups on specific measures to enhance localism. These may be measures proposed in the NPRM or alternatives that better comport with NCE broadcasting.

In a proceeding of such far-reaching import as this one, the evaluation and consultation process is both important and challenging, given the need for stations to maintain ongoing operations. An extension of time will allow the PBNOs, their members, and other interested public broadcasting entities to address the issues raised in the Report and NPRM during a number of upcoming industry events. For instance, NPR's 2008 annual membership meeting is scheduled for March 11-12, following a meeting of general managers of public radio stations serving the mid-America region on March 10-11, and preceding a Corporation for Public Broadcasting National Leadership Meeting on March 12-13. The annual conference of the National Federation of Community Broadcasting is scheduled for March 26-29, the PBS annual

⁴ Report and NPRM at ¶¶ 8-9.

technology conference is scheduled for April 9-11, and the annual convention of the National Association of Broadcasters is scheduled for April 12-17. These important industry events provide significant opportunities for information gathering and consultation, which should result in a more complete record in this proceeding.

Finally, the requested extension will not unduly delay resolution of the issues raised in the NPRM or prejudice any party. There is no impending event that requires immediate Commission action, and, while we appreciate the Commission's desire to move forward, the goal of enhancing localism would be better served by according the public additional time to respond to the NPRM.

Conclusion

Accordingly, for good cause having been shown, the Public Broadcasting National Organizations urge the Commission to grant the foregoing request for an extension of the deadline for filing comments to and including April 28, 2008, and of the reply comments to and including June 11, 2008.

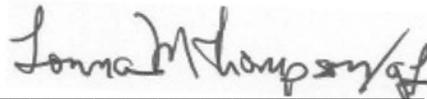
Respectfully Submitted,

NATIONAL PUBLIC RADIO, INC.



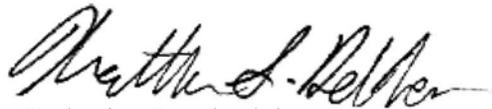
Mari Stanley Dennehy
Acting Vice President for Legal Affairs
General Counsel and Secretary
Michael Riksen
Vice President, Policy & Representation
Gregory A. Lewis
Associate General Counsel
National Public Radio, Inc.
635 Massachusetts Avenue, N.W.
Washington, DC 20001
Phone: (202) 513-2040
Fax: (202) 513-3021

ASSOCIATION OF PUBLIC TELEVISION STATIONS



Lonna M. Thompson
Senior Vice President and General Counsel
Malena F. Barzilai
Senior Counsel
Association of Public Television Stations
666 11th Street, N.W.
Suite 1100
Washington, D.C. 20001
Phone: 202-654-4200
Fax: 202-654-4236

PUBLIC BROADCASTING SERVICE



Katherine Lauderdale
Senior Vice President and General Counsel
Matthew S. DelNero
Senior Counsel and Communications Counsel
Public Broadcasting Service
2100 Crystal Drive
Arlington, Virginia 22202
Phone: 703-739-5000
Fax: 703-837-3300

February 26, 2008

CERTIFICATE OF SERVICE

I, Gregory Lewis, hereby certify that a copy of the foregoing "Motion for Extension of Time" was sent via email on this 26th day of February 2008 to the following:

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street, S.W., Room 8-B201
Washington, D.C. 20554

Commissioner Michael J. Copps
Federal Communications Commission
445 12th Street, S.W., Room 8-B115
Washington, D.C. 20554

Commissioner Jonathan S. Adelstein
Federal Communications Commission
445 12th Street, S.W., Room 8-A302
Washington, D.C. 20554

Commissioner Deborah Taylor Tate
Federal Communications Commission
445 12th Street, S.W., Room 8-A204
Washington, D.C. 20554

Commissioner Robert M. McDowell
Federal Communications Commission
445 12th Street, S.W., Room 8-C302
Washington, D.C. 20554

Monica Desai
Chief
Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554



Gregory A. Lewis