

**Before the
Federal Communications Commission
Washington, D.C. 20554**

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

To: The Commission

**COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF
DEADLINE FOR FILING OF COMMENTS AND REPLY COMMENTS**

The National Association of Broadcasters (“NAB”)¹ hereby submits comments in support of the Motion for Extension of Deadline for Filing of Comments and Reply Comments, filed on February 21, 2008, by the named State Broadcasters Associations (“SBA”) in the above-captioned proceeding.²

As noted by SBA, the current deadlines will not allow parties sufficient time to produce an administratively adequate record on which the Commission could properly resolve the Notice. First, the existing pre-Notice record submitted in response to the Notice of Inquiry in this proceeding generated more than 80,000 comments that require examination. Second, the Notice is vast in terms of both scope and potential impact. The Commission reaches tentative conclusions, and seeks comment on, numerous substantive proposals that will require careful analysis. For example, parties must consider the disparate

¹ NAB is a nonprofit trade association that advocates on behalf of more than 8,300 free, local radio and television stations and also broadcast networks before Congress, the Commission and the Courts.

² *Broadcast Localism*, Notice of Proposed Rulemaking, MB Docket No. 04-233 (rel. Jan. 24, 2008) (“Notice”).

impacts that the Commission's conclusions and suggestions concerning content-based license renewal processing guidelines, ascertainment, station playlists, the main studio rule, and automated operations, will have on different sectors of the broadcasting industry, including both radio and television stations, small and large stations, broadcasters in small, mid-sized and large markets, and station groups and independent stations.

Moreover, NAB and others must consider possible alternative ways to address the concerns expressed in the Notice, and their impact on the diverse broadcasting industry. Finally, it is possible that NAB or another party may seek to conduct a survey or study that could inform the Commission's decisions. Any such endeavor would be time-consuming.

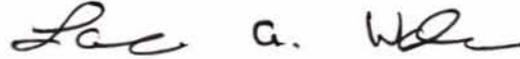
NAB supports an extension so as to encourage submissions that will be most useful to the Commission's deliberations. The dates that SBA suggests for comments and reply comments, April 28, 2008 and June 11, 2008, respectfully, should provide sufficient time to produce such comments.³

³ The Minority Media & Telecommunications Council ("MMTC") has informed NAB that it also supports an extension of the comment deadlines in this proceeding, as set forth in SBA's Motion. MMTC states that the complexity and vast scope of issues raised in the Notice deserve careful consideration that cannot be adequately conducted within the existing deadlines.

For the foregoing reasons, NAB respectfully supports SBA's Motion for Extension of Time.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS
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A handwritten signature in black ink, appearing to read "Lawrence A. Walke".

Marsha J. MacBride
Jane E. Mago
Lawrence A. Walke

Dated: February 27, 2008