

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

In the Matter of)	
)	
Promoting Diversification of Ownership in the Broadcasting Services)	MB Docket No. 07-294
)	
)	
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
)	
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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 June 30, 2008 to July 30, 2008, the deadline for filing comments in response to the Third Further Notice of Proposed Rulemaking,² and to extend, from July 14, 2008 to August 29, 2008, the deadline for filing reply comments.³

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).

² Promoting Diversification of Ownership in the Broadcasting Services (R&O and Third FNPRM), 23 FCC Rcd 5922 (released March 5, 2008) (“Diversity R&O and Third FNPRM”), 73 Fed. Reg. 28361 (“Fed. Reg. Publication”).

The Commission seeks comment on twelve proposals that blanket a very wide swath of communications policy.⁴ The proposals contemplate that the Commission would, *inter alia*:

- revise the definition of a socially and economically disadvantaged business
- use its share-time rule to permit ownership of FM HD subchannels
- allow an AM expanded band station owner to keep one of its paired stations if it sells the other station to a small business (or to keep both stations if it is itself a small business)
- allow modest structural rule waivers for incubating eligible entities
- relax the community of license rules to facilitate move-ins and to advance LPFM service
- authorize must-carry for Class A LPTV stations
- migrate AM stations into the TV Channels 5 and 6 spectrum, and convert the AM stations to FM
- consider the minority ownership consequences of assignment and transfer applications.

The concurrence of a wide variety of parties has been vital whenever the Commission has embraced minority ownership proposals.⁵ Therefore, DCS will work closely with all stakeholders to explain the proposals, learn the stakeholders' concerns, and seek their support. It is possible to do this by July 30, 2008, and to file reply comments by August 29, 2008 in response to what we expect will be a very robust accumulation of comments.

Since the need for new minority ownership initiatives is profound, consideration of these proposals should not be delayed unless -- as in this instance -- a modest extension of time would facilitate the development of a full record. Fortunately, the Commission is faced with no

of the Diversity R&O”), 73 Fed. Reg. 28400 (May 16, 2008) (“Fed. Reg. Publication of the Diversity Third FNPRM”), 73 Fed. Reg. 30875 (May 29, 2008) (“Fed. Reg. Order Correcting the Third FNPRM”).

³ In reducing the comment and reply times by 15 days and one month respectively, the Fed. Reg. Order Correcting the Third FNPRM explained only that there had been a “clerical error.”

⁴ See Diversity R&O and Third FNPRM, 23 FCC Rcd at 5923 and the paragraphs cited there.

⁵ For example, when it adopted thirteen proposals in the Diversity R&O and Third FNPRM, the Commission drew heavily on the widespread support these proposals had attracted. See id., 23 FCC Rcd at 5925 n. 6, 5942 ns. 102 and 104 and 5945 n. 116 (citing NAB Comments), id. at 5925 n. 8, 5939 n. 87, 5940 n. 94 and 5942 ns. 101, 102 and 104 (citing Consumer Union, Consumer Federation of America and Free Press Comments); id. at 5925 n. 9 (citing Clear Channel Communications Comments), id. at 5930 n. 37 (citing Entravision Holdings, LLC proposal), id. at 5934 n. 63 (citing AWRP Comments), id. at 5934 n. 65 (citing Nexstar Broadcasting, Inc. Comments), id. at 5935 n. 70 (citing ION Media Networks Reply Comments), id. at 5935 n. 71 (citing Reply Comments of eight Financial Services Companies); id. at 5942 n. 102 (citing NABOB and Rainbow/PUSH Coalition Comments).

congressional deadlines as to any of the twelve pending proposals.

DCS has been authorized to state that the following parties concur with this Motion:⁶

1. Belo Corp.
2. Benton Foundation
3. Common Cause
4. Community Broadcasters Association
5. Council Tree Communications, Inc.
6. Destiny Communications LLC
7. Dover Capital Partners, LLC
8. First Broadcasting Investment Partners, LLC
9. Gannett Co., Inc.
10. Granite Broadcasting Corporation
11. Independent Spanish Broadcasters Association
12. Media Alliance
13. Mullaney Engineering
14. National Association of Broadcasters
15. National Organization for Women
16. News Corporation
17. Spanish Broadcasting System, Inc.
18. ZGS Communications

Wherefore, for the reasons stated above, the Commission should grant an extension of time to July 30, 2008 for comments and August 29, 2008 for reply comments.

Respectfully submitted,

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⁶ The Commission has recognized that one of the proposals, which contemplates reallocation of TV Channels 5 and 6 for FM service, is particularly far-reaching. See Diversity R&O and Third FNPRM, 23 FCC Rcd at 5956 ¶100 (“We agree with DCS that this proposal could yield tremendous opportunities for new entrants[.]”) The proposal’s proponent, Mullaney Engineering, Inc. (“Mullaney”) has notified DCS that it especially needs the 30-day extension of time sought herein in light of the fact that Mullaney’s engineers must file, by the due date of June 20, 2008, DTV maximization applications and long form FM translator applications.