

NOV 23 2009

Federal Communications Commission
Office of the Secretary

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

In the Matter of)	
)	
Promoting Diversification of Ownership)	MB Docket No. 07-294
In the Broadcasting Services)	
)	
2006 Quadrennial Regulatory Review – Review of)	MB Docket No. 06-121
the Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
2002 Biennial Regulatory Review – Review of the)	MB Docket No. 02-277
Commission’s Broadcast Ownership Rules and)	
Other Rules Adopted Pursuant to Section 202 of)	
the Telecommunications Act of 1996)	
)	
Cross-Ownership of Broadcast Stations and)	MB Docket No. 01-235
Newspapers)	
)	
Rules and Policies Concerning Multiple Ownership)	MB Docket No. 01-317
of Radio Broadcast Stations in Local Markets)	
)	
Definition of Radio Markets)	MB Docket No. 00-244
)	
Ways to Further Section 257 Mandate and To Build)	MB Docket No. 04-228
On Earlier Studies)	
)	
TO: Marlene H. Dortch, Secretary		
Federal Communications Commission		
ATTN: The Commission		

STATEMENT IN SUPPORT OF MOTION FOR STAY

Lauren A. Colby, on behalf of himself and his clients, hereby files the following Statement in support of the Motion for Stay, filed in this proceeding by Fletcher, Heald & Hildreth, P.L.C., on November 16, 2009. In support thereof, it is alleged:

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LBI ABCDE

1. On October 30, 2009, the Media Bureau released a *Public Notice*, DA 09-2275, advising that a new Ownership Report, FCC Form 323, was expected to be available on or about November 16, 2009, and that all licensees would be expected to file Ownership Reports using the new form by December 15, 2009. The undersigned operates a small, one man law office with three employees. We have been reviewing the Commission's website daily, looking for the new form, but it has not yet been released. When it is finally released, time will be needed to study the requirements of the new form and to prepare ownership reports for all of our clients using the new form. Even if the form became available today, there would not be a sufficient amount of time remaining to complete all of this work by the December 15, 2009, deadline.

2. On November 16, 2009, the law firm of Fletcher, Heald & Hildreth filed a Motion for Stay, asking the Commission, *inter alia*, to postpone the deadline until such time as "the Commission takes adequate steps, consistent with its statutory obligations, to: (a) provide notice and opportunity for comment relative to any obligation to provide FRN's for any and all individuals holding any form of attributable interest, and (b) adopt and release documentation of its privacy policies for the collection of private information that such obligation would entail."

3. The undersigned shares the privacy and notice concerns expressed in the Motion for Stay. Even more importantly, however, there are practical concerns related to the December 15 deadline. Even if the new form became available today, insufficient time exists in which to study the form; obtain the required information from the clients; and file the reports for all of the clients by the December 15 deadline. Therefore, something must be done.

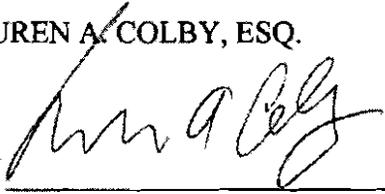
4. The approach suggested by Fletcher, Heald & Hildreth makes sense and we support the Motion for Stay in its entirety. John Trent of the law firm of Putbrese, Hunsaker & Trent, P.C., joins in this statement.

Respectfully submitted,

November 23, 2009

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LAUREN A. COLBY, ESQ.

By: 

Lauren A. Colby

JOHN C. TRENT, ESQ.

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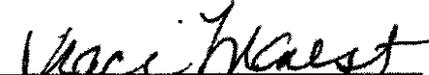
By: 

John C. Trent

CERTIFICATE OF SERVICE

I, Traci Maust, a secretary in the law office of Lauren A. Colby, do hereby certify that copies of the foregoing have been sent via first class, U.S. mail, postage prepaid, this 23rd day of November, 2009, to the offices of the following:

Harry F. Cole, Esq.*
Dan Kirkpatrick, Esq.
Fletcher, Heald & Hildreth, P.L.C.
1300 N. 17th Street – 11th Floor
Arlington, VA 22209


Traci Maust

*Also via electronic mail.