

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

In the Matter of)	
)	
Preserving the Open Internet)	GN Docket No. 09-191
)	
Broadband Industry Practices)	WC Docket No. 07-52
)	

MOTION FOR EXTENSION OF TIME

The American Federation of Television and Radio Artists, the Directors Guild of America, the International Alliance of Theatrical Stage Employees, and the Screen Actors Guild (collectively, the “Guilds and Unions”), 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 due date for filing reply comments in the above-captioned proceeding through April 30, 2010.¹ Reply comments are currently due on March 5, 2010.² Extending the deadline to file reply comments will enable the Commission to receive responses that more fully address the issues raised in this rulemaking proceeding, and will also afford affected parties the opportunity to develop a more complete record for the Commission’s consideration.

As the Commission is aware, transportation in and out of the Washington, D.C. area was brought to a halt by major snowstorms during the week of February 8, 2010. These storms forced a nearly week-long closure of the Federal government, making it difficult for parties to meet or communicate with Commission staff regarding the critical issues under review in this

¹ See *In re Preserving the Open Internet; Broadband Industry Practices*, GN Docket No. 09-191, WC Docket No. 07-52, FCC 09-93 (Notice of Proposed Rulemaking) (rel. Oct. 22, 2009) (the “Notice”).

² See *id.*

proceeding. Representatives of the Guilds and Unions were scheduled to travel from Los Angeles and New York to Washington, D.C. during the week of February 8, 2010, during which they had two days of FCC meetings planned. It was their hope that through those meetings the Guilds/Unions would gain a greater understanding of the FCC's perspective on the various filings, including theirs, and they would be able to further refine their decision making with respect to whether to undertake reply comments. Of course that trip could not take place due to the inclement weather. Unfortunately the earliest that all these representatives are again free to travel to Washington DC is the second week of March, after the reply date. Thus, they will not be afforded the opportunity to communicate with Commission staff prior to the need to determine whether, and how to formulate and draft their reply comments.

Given these circumstances, the Guilds and Unions respectfully request that the Commission extend the deadline for filing reply comments in this proceeding through April 30, 2010. This extension would serve the public interest by facilitating the submission of more meaningful reply comments, which would serve to enhance the record available to the Commission throughout the duration of the rulemaking process.

Respectfully submitted,



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