

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

In the Matter of)
)
Standardizing Program Reporting) MB Docket No. 11-189
Requirements for Broadcast Licensees)

To: Secretary, Federal Communications Commission

**MOTION FOR EXTENSION OF DEADLINES FOR
FILING COMMENTS AND REPLY COMMENTS**

The Radio Television Digital News Association (“RTDNA”), through counsel and pursuant to Section 1.46 of the Commission’s Rules, 47 C.F.R. § 1.46, hereby respectfully requests an extension of time, through February 7, 2012 and February 21, 2012, respectively, in which to file opening and reply comments in response to the Commission’s *Notice of Inquiry* (“*NOI*”) in this proceeding.¹

In its Order on Reconsideration and Further Notice of Proposed Rulemaking, the Commission vacated all aspects of its 2007 *Enhanced Disclosure Report and Order*, including the FCC Form 355, and acknowledged that the form as adopted in 2007 was overly burdensome for broadcasters and that the issues surrounding the form are complex.² In the current proceeding, the Commission notes that it is attempting to address many of the “shortcomings” attributed to the Form 355, and to “substantially reduce” the burden it will impose on broadcasters. It follows that considered study and a record that contains specific facts as to how

¹ *In the Matter of Standardizing Program Reporting Requirements for Broadcast Licensees*, Notice of Inquiry, MB Docket No. 11-189, FCC 11-169 (rel. Nov. 14, 2011) (“*NOI*” or “*Standardized Program Report Proceeding*”).

² See *Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations*, Order on Reconsideration and Further Notice of Proposed Rulemaking, 26 FCC Rcd. 15788 (2011).

the Commission's new proposals will impact licensees will be critically important to the Commission's evaluation of its new proposed standardized program reporting requirements, if the agency truly is to take a "fresh look" and achieve its stated goals.

The specific reporting categories and definitions proposed in the *NOI*, by their very nature, will involve personnel in television newsrooms. As a professional association whose membership largely is comprised of journalists working at broadcast stations, RTDNA is uniquely situated to gather input and offer specific examples from its members about the proposals advanced in the *NOI*, including the consequences for local newsgathering and reporting functions. RTDNA has, however, recently undergone a restructuring and named a new Executive Director whose tenure effectively began as of January 1. As a result of these changes, RTDNA's new leadership is now studying the proposals advanced in the *NOI* and implementing new systems to gather information from the association's membership. If RTDNA is to provide valuable, fact-based input critical to the Commission's decision making, it needs more time to gather and synthesize relevant information. The short extension of time requested herein will enable RTDNA to complete that process.

WHEREFORE, for the foregoing reasons, RTDNA respectfully requests an extension of time through February 7, 2012 and February 21, 2012 to file comments and reply comments in this proceeding.

Respectfully submitted,

RADIO TELEVISION DIGITAL NEWS
ASSOCIATION

By:/s/

Kathleen A. Kirby
Ari S. Meltzer
Wiley Rein LLP
1776 K Street NW
Washington, DC 20006
TEL: 202.719.7000
FAX: 202.719.7049

Its counsel

Dated: January 5, 2012