

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of:) CG Docket No. 06-181
) Case No. CGB-CC-0203
) Case No. CGB-CC-0287
) Case No. CGB-CC-0572
) Case No. CGB-CC-0923
Request for Exemption from) Case No. CGB-CC-1019
Commission's Closed) Case No. CGB-CC-1032
Captioning Rules) Case No. CGB-CC-1170
) Case No. CGB-CC-1240
) Case No. CGB-CC-1243
) Case No. CGB-CC-1252
) Case No. CGB-CC-1253
) Case No. CGB-CC-1256

Motion for Extension of Time

Telecommunications for the Deaf and Hard of Hearing, Inc. (TDI)
National Association of the Deaf (NAD)
Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN)
Association of Late-Deafened Adults (ALDA)
California Coalition of Agencies Serving the Deaf and Hard of Hearing (CCASDHH)
Cerebral Palsy and Deaf Organization (CPADO)

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via electronic filing
December 20, 2012

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Pursuant to 47 C.F.R. § 1.46(b) and 79.1(f)(8), Telecommunications for the Deaf and Hard of Hearing Inc., (TDI), the National Association of the Deaf (NAD), the Deaf and Hard of Hearing Consumer Advocacy Network (DHHCAN), the Association of Late-Deafened Adults (ALDA), and the Cerebral Palsy and Deaf Organization (CPADO), collectively, “Consumer Groups,” respectfully submit this motion to extend the public comment period by 14 days for the above-referenced petitions for exemptions from the Commission’s closed captioning rules. On November 30, 2012, the Commission issued a Public Notice requesting public comment on the above-referenced petitions within 30 days. Under 47 C.F.R. § 1.4(e)(1) and (j), those comments are currently due on December 31, 2012. Consumer Groups request that the due date for comments be extended by 14 days to January 14, 2013.

We ask for this modest extension of time to accommodate the fact that counsel’s offices at the Institute for Public Representation will be closed from December 24, 2012 until January 1, 2013 pursuant to Georgetown University policy. This closure imposes serious administrative difficulties on filing and serving hard copies of comments, of which the Commission does not permit electronic filing in this proceeding. Moreover, the Consumer Groups are also in the midst of preparing reply comments in the Media Bureau’s proceeding regarding Accessible Emergency Information, MB Docket No. 12-107, which are now due just days later on January 7, 2013.¹ An extension of time will permit the Consumer Groups to comprehensively offer the perspective of the deaf and hard of hearing community on the important issues raised by that proceeding and the above-referenced petitions, thereby helping ensure that the results of all of the proceedings most effectively serve the public interest.

Consumer Groups acknowledge the admonition of Rule 1.46(a) that “[i]t is the policy of the Commission that extensions of time shall not be routinely granted,” and

¹ http://transition.fcc.gov/Daily_Releases/Daily_Business/2012/db1207/DA-12-1985A1.pdf

further acknowledge the importance to both deaf and hard of hearing consumers and video programmers of expediently resolving petitions for exemptions from the Commission's closed captioning rules. Nevertheless, Rule 79.1(f)(8) permits the Commission to lengthen comment periods on exemption petitions for good cause, and Rule 79.1(f)(11) exempts petitioners' programming during the pendency of petitions, ensuring that no petitioner will be prejudiced by a brief extension of the comment period. Accordingly, we ask that the Commission extend the comment period for the above-referenced petitions to January 14, 2013.

Respectfully submitted,

/s/ _____

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December 20, 2012

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