



State of New Jersey
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CHRIS CHRISTIE
Governor

KIM GUADAGNO
Lt. Governor

STEFANIE A. BRAND
Director

January 15, 2013

Electronically Filed

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: I/M/O Petitions of Comcast Cable Communications, LLC
For a Determination of Effective Competition in Communities in New Jersey
MB Docket No. 12-152, CSR-8649-E
MB Docket No. 12-159, CSR-8650-E
MB Docket No. 12-160, CSR-8651-E
MB Docket No. 12-161, CSR-8652-E
MB Docket No. 12-164, CSR-8655-E
MB Docket No. 12-165, CSR-8656-E
MB Docket No. 12-166, CSR-8657-E
MB Docket No. 12-180, CSR-8668-E
MB Docket No. 12-183, CSR-8671-E
MB Docket No. 12-190, CSR-8675-E**

Motion for Extension of Time to File Opposition

Dear Secretary Dortch:

Enclosed for filing is a Motion for Extension of Time to File Opposition, on behalf of the New Jersey Division of Rate Counsel in connection with the above referenced matter.

This Motion will be electronically filed through the Commission's Electronic Filing system.

Very truly yours,

Stefanie A. Brand
Director, Division of Rate Counsel

By:



Christopher J. White, Esq.
Deputy Rate Counsel

cc: Service List

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

In the Matter of:)	
)	
Comcast Cable Communications, LLC)	
On behalf of its subsidiaries and affiliates)	
)	
For a Determination of Effective Competition in)	
Beachwood, NJ–Area Franchise Areas)	CSR-8650-E
)	MB Docket No. 12-159
)	
East Windsor, NJ–Area Franchise Areas,)	CSR-8651-E
)	MB Docket No. 12-160;
)	
Hazlet, NJ (NJ0405),)	CSR-8652-E
)	MB Docket No. 12- 161
)	
Chatham, NJ–Area Franchise Areas,;)	CSR-8657-E
)	MB Docket No. 12-166
)	
Buena, NJ–Area Franchise Areas,)	CSR-8656-E
)	MB Docket No. 12-165
)	
Delaware, NJ–Area Franchise Areas,)	CSR-8668-E
)	MB Docket No. 12-180
)	
Berkeley Heights, NJ– Area Franchise Areas,)	CSR-8671-E
)	MB Docket No. 12-183
)	
Bellmawr, NJ–Area Franchise Areas,)	CSR-8675-E
)	MB Docket No. 12-190
)	
North Arlington, NJ (NJ0298) &)	CSR-8649-E
Rutherford, NJ (NJ0294),)	MB Docket No. 12-152
)	
)	CSR-8655-E
Bordentown (City), NJ (NJ0511) &)	MB Docket No. 12-164
Bordentown (Township), NJ (NJ0461),)	

To: Chief, Media Bureau

MOTION FOR EXTENSION OF TIME TO FILE OPPOSITION

Pursuant to Section 1.46 of the Commission's Rules, 47 C.F.R. § 1.46, the New Jersey Division of Rate Counsel ("Rate Counsel") hereby requests that the Federal Communications Commission ("FCC") extend the deadline for filing of opposition to the above captioned Petitions. The time to file opposition comments will expire on January 22, 2013. Rate Counsel requests a thirty (30) day extension, until February 22, 2013, to file comments in opposition to the Petitions.

On December 20, 2012 the Media Bureau adopted a Protective Order to govern the disclosure of confidential data submitted by Comcast Cable Communications, LLC, ("Comcast") in support of the referenced Petitions. Comcast counsel advised by letter dated December 21, 2012 that responses to the Petitions are due thirty (30) days from adoption of the Protective Order; hence, the filing date for opposition would be January 22, 2013.¹ Rate Counsel subscribed to the Protective Order on January 4, 2013 upon return from the Christmas Holidays, and immediately filed the same with the FCC, and requested the confidential data from Comcast. Rate Counsel received copies of the unredacted Petitions on January 10, 2013.

On January 11, 2013, Rate Counsel requested from Comcast's counsel consent to a thirty (30) day extension. On January 14, 2012, Comcast's counsel advised that it would only agree to two week extension. A two week extension is inadequate to complete review and filing of comments on the Petitions that seek grant of effective competition in more than 90 franchise areas. Therefore, Rate Counsel requests a thirty day extension (1) to complete other workload demands related to other matters being

^{1/} Thirty days from December 21, 2012 is January 20, 2013, a Sunday. The following Monday is a Federal Holiday – Martin Luther King Jr's birthday is observed. Therefore, the filing due date would be January 22, 2013.

handled by Rate Counsel and such workload preclude completion of comments on these Petitions by January 22, 2013, (2) to complete its examination and analysis of the confidential information provided on January 10, 2013, (3) to obtain and review from third parties additional information necessary to respond to the Petitions, and (4) to coordinate with consultants and complete internal review for filing of oppositions.

In conclusion, an extension of thirty (30) days within which Rate Counsel may file comments in opposition to the referenced Petitions is appropriate and warranted under the circumstances. Rate Counsel submits that it has shown good cause for the FCC to grant the requested extension and permit development of a full and complete record in this matter.

Respectfully submitted,

STEFANIE A. BRAND
DIRECTOR,
NEW JERSEY DIVISION OF RATE COUNSEL

By: 
Christopher J. White, Esq.
Deputy Rate Counsel

Date: January 15, 2013.

Cc: Service List

CERTIFICATE OF SERVICE

I, Christopher J. White, of full age, being duly sworn according to law, upon my oath depose and state:

I am an attorney at law in the State of New Jersey, and a Deputy Rate Counsel, with the New Jersey Division of Rate Counsel, and the Managing Attorney for the Division's Telecommunications and Cable Section. I have on this 15th day of January, 2013, sent a true and correct copy of the foregoing "Motion for Extension of Time" via electronic mail to the following:

Steve Broeckaert
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Frederick W. Giroux, Esq.
Davis Wright Tremaine LLP
1919 Pennsylvania Avenue, NW
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Washington, D.C. 20006-3401



Christopher J. White, Esq.
Deputy Rate Counsel
New Jersey Division of Rate Counsel