

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
FCC Seeks Comment on Adopting)	GN Docket No. 13-86
Egregious Cases Policy)	
)	

MOTION FOR EXTENSION OF TIME

College Broadcasters Inc. (CBI)¹ hereby requests that the Commission grant an extension of the deadline for the submission of reply comments in response to the above-captioned Public Notice². Reply comments currently are due on July 18, 2013³. We request an extension of this deadline to August 2, 2013, just fifteen (15) days after the current deadline.

This requested extension is needed for CBI and individual stations review and develop reply comments due to the extraordinary⁴ number of comments submitted in this proceeding. The FCC Electronic Comment Filing System indicates that well over 60,000 comments have been filed in response to the Notice with majority of substantive responses having been filed on or close to the comment deadline. The Notice seeks comment on a complex matter which has

¹ CBI is a 501(c)(3) tax-exempt not-for-profit organization whose membership consists hundreds of university, college and high school radio, television stations and other electronic media such as webcasters. CBI has represented its members before Congress, the Federal Communications Commission, the Copyright Royalty Board and other federal agencies and courts.

² FCC Reduces Backlog of Broadcast Indecency Complaints by 70% (More than One Million Complaints); Seeks Comment on Adopting Egregious Cases Policy, Public Notice in GN Docket No. 13-86, DA 13-581 (Apr. 1, 2013) (Notice).

³ On April 26, 2013, the National Association of Broadcasters filed a Motion for Extension of Time which was granted on May 10, 2013, which pushed the original comment and reply comment period back 30 days.

⁴ The FCC Electronic Comment Filing System indicates that well over 60,000 comments have been filed in response to the Notice.

been hotly debated before the FCC and the courts since at least 1978.

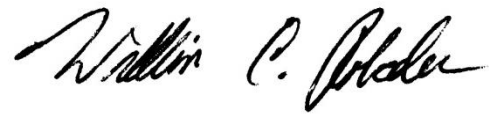
Moreover, in inviting comments, the Notice did not limit the scope of its request to egregious versus fleeting expletives policies, but rather invited comments to address the much broader question by of whether the “Commission should make changes to its current broadcast indecency policies or maintain them as they are”⁵.

CBI and its FCC-licensed members are particularly interested in the outcome of this proceeding given their extreme vulnerability due to their limited budgets, the nature of their staffing and potential for their parent institution holding the license to sell or abandon a license due to an indecency complaint, regardless of the validity due to the cost involved of having to defend itself against such a complaint, makes it integral that they have an opportunity to actively participate. Thus in light of the foregoing concerns, academic calendars - - many students involved with their student-run stations are now on summer break -- and the sheer volume of comments to reply to, granting this modest extension is reasonable and proper and will help ensure that those affected by FCC policy have adequate opportunity to participate in shaping it.

Accordingly, CBI requests a 15-day extension of the deadline for reply comments.

⁵ Notice at 1-2 (asking for comment on specific questions about these indecency policies, “as well as any other aspect” of those policies).

Respectfully submitted,



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July 1, 2013