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

| | | |
|---|---|---|
| In the Matter of: | ) | |
| | ) | |
| Carriage Complaint Against | ) | |
| | ) | |
| Blue Ridge Cable Technologies | ) | Docket No. 12-365 |
| | ) | File No. CSR-8753-M |
| by | ) | |
| | ) | |
| Western Pacific Broadcast, LLC | ) | |
| | ) | |
| With Respect to Carriage Within the | ) | |
| Philadelphia, PA Designated Market Area, | ) | |
| of Local Commercial Television Station WACP, | ) | |
| Licensed to Atlantic City, New Jersey | ) | |

Directed to: The Chief, Media Bureau

**MOTION FOR EXTENSION OF TIME TO REPLY TO OPPOSITION TO PETITION FOR SPECIAL RELIEF BY ORDER OF CARRIAGE**

Western Pacific Broadcast, LLC ("Western Pacific"), pursuant to Rule 1.46, hereby respectfully requests that the Bureau grant Western Pacific an extension of time, ending on September 6, 2013, in which to file its reply to the opposition (the "Opposition") submitted by Blue Ridge Cable Technologies ("Blue Ridge") to Western Pacific's above-captioned petition for an order requiring Blue Ridge to carry local commercial television station WACP in accordance with the Commission's must carry rules and policies on Blue Ridge's cable system(s) within the Philadelphia, PA designated market area for the remaining duration of the current must carry election cycle, expiring December 31, 2014.

The Opposition alleges that that Blue Ridge does not receive a good quality signal at Blue Ridge's principal headends. Blue Ridge also had filed a request to exclude its CUIDs from WACP's television market, but Blue Ridge agreed to dismiss that petition and has done so.[1]

All that remains to enable Blue Ridge cable subscribers to receive WACP is the resolution of this proceeding. At this time, Western Pacific is in the process of completing some minor repairs to its transmitter that will optimize the signal-to-noise ratio. After those repairs are completed, Western Pacific's consulting engineer and Blue Ridge's engineer will resume collaboration toward agreeing upon receiver designs that, hopefully, will enable the WACP signal to be received at both headends with a signal strength qualifying as good quality. We are hopeful that these discussions and any associated tests will result in an agreement between the parties that will informally resolve this dispute without the need for the Bureau to dedicate its resources to the consideration of the pleadings and the development of an order to formally resolve this dispute. Moreover, the grant of this motion could only harm the movant, Western Pacific, who is the party requesting action by the Bureau. For these reasons, the grant of this motion would be in the public interest. Counsel for Blue Ridge has authorized Western Pacific to represent that Blue Ridge is aware of the intention of Western Pacific to file this motion and will not interpose an objection to this motion.

---

[1] That market modification petition was assigned CSR-8793-A and Docket 13-130.

**WHEREFORE**, the foregoing premises considered, Western Pacific Broadcast, LLC hereby respectfully requests that the Bureau grant the additional time requested for Western Pacific Broadcast, LLC to submit its reply in the above-captioned matter.

Respectfully submitted,

WESTERN PACIFIC BROADCAST LLC

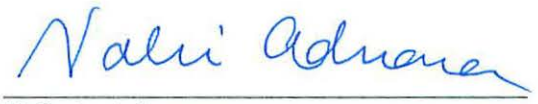
By: _____
M. Scott Johnson
Thomas J. Dougherty, Jr.
Its Counsel

FLETCHER, HEALD & HILDRETH, PLC
1300 North 17th Street, Suite 1100
Arlington, VA 22209
(703) 812-0400

## CERTIFICATE OF SERVICE

I, Valerie Admana, hereby certify that on this 7th day of August, 2013, I caused a copy of the foregoing "Motion for Extension of Time to Reply to Opposition to Petition for Special Relief by Order of Carriage" to be served via U.S. mail, postage prepaid, upon the following persons:

John R. Wilner, Esq.
Ari Z. Moskowitz, Esq.
Edwards Wildman Palmer LLP
1255 23rd Street, NW
Eighth Floor
Washington, DC 20037



Valerie Admana