

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

In the Matter of )  
Promoting Diversification in the ) MB Docket No. 07-294  
Broadcasting Services )  
)

To: Chief, Media Bureau

**COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME**

The National Association of Broadcasters (NAB)<sup>1</sup> hereby submits these comments in support of a recently filed request for extension of time for submission of biennial ownership reports.<sup>2</sup> NAB urges the FCC to provide filers with the requested additional time to complete and submit their reports.

This summer, the Media Bureau established a filing deadline of December 2, 2013 for broadcast licensees to submit their FCC Forms 323.<sup>3</sup> The window for commencing the filing process was scheduled to open on Tuesday, October 1, 2013.<sup>4</sup> The Bureau thus estimated that a 60-day window would provide “adequate time to prepare the form” in light of the Bureau’s awareness that “some licensees and parent entities of multiple stations may be required to file numerous forms.”<sup>5</sup> The Bureau stated that its filing

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<sup>1</sup> NAB is a nonprofit trade association that advocates on behalf of free, local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> See Letter from Melodie A. Virtue, Garvey Schubert Barer, to Marlene H. Dortch, FCC Secretary (filed in MB Docket No. 07-294 on Nov. 6, 2013).

<sup>3</sup> *Promoting Diversification in the Broadcasting Services*, Order, 28 FCC Rcd 11274 (2013).

<sup>4</sup> *Media Bureau Announces Opening of Filing Window for 2013 Biennial Ownership Reports, Form 323*, DA No. 13-1999, MB Docket No. 07-294, Public Notice, 25 FCC Rcd 3595 (MB, 2013).

<sup>5</sup> *Promoting Diversification in the Broadcasting Services*, Order, 28 FCC Rcd 11274 ¶ 4 (2013).

deadline would serve the public interest by giving filers sufficient time to file “accurate and reliable data on which the Commission may rely for research and other purposes.”<sup>6</sup>

NAB agrees that the 60-day window originally planned by the Media Bureau serves the public interest. The extension requested by Garvey Schubert Barer would restore the filing time that was lost was due to the government shutdown from October 1 – October 16, 2013, and would set a new filing deadline of December 20, 2013. This additional time would assist broadcast licensees and other filers in submitting complete and accurate ownership reports in a timely manner.

NAB also understands from conversations with several of our members and their counsel that, since the FCC re-opened on October 17, certain technical problems have impeded filers’ efforts to timely file ownership reports. We urge FCC staff to favorably consider waivers of the general deadline where appropriate for individual broadcasters who have been adversely affected by such technical difficulties.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**  
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Jerianne Timmerman  
Erin L. Dozier

November 8, 2013

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<sup>6</sup> *Id.*