

**Before the
Federal Communications Commission
Washington, D.C. 20554**

| | | |
|----------------------------------------------------------------------|---|----------------------|
| In the Matter of |) | |
| |) | |
| Assessment and Collection of Regulatory Fees for Fiscal Year 2014 |) | MD Docket No. 14-92 |
| |) | |
| Assessment and Collection of Regulatory Fees for Fiscal Year 2013 |) | MD Docket No. 13-140 |
| |) | |
| Procedures for Assessment and Collection of Regulatory Fees |) | MD Docket No. 12-201 |
| |) | |



**MOTION FOR EXTENSION OF TIME
TO FILE REPLY COMMENTS**

The American Cable Association (“ACA”) files this Motion seeking a one-week extension of time for parties to file reply comments in the above-referenced proceedings.

On June 13, 2014, the Commission released a Notice of Proposed Rulemaking and Further Notice of Proposed Rulemaking seeking comment on the Commission’s proposed regulatory fees for fiscal year 2014 and its efforts to improve the regulatory fee process.¹ The Commission established July 14, 2014 as the deadline for filing reply comments.² For the reasons described below, ACA seeks a one-week extension for parties to file reply comments.

ACA requests this extension to ensure that it and other interested parties can more fully develop the record in response to other comments filed in this proceeding. Numerous parties filed comments related to the Commission’s proposals, including the two direct broadcast satellite (“DBS”) commenters who jointly filed lengthy comments, including 3 appendices.³

¹ *Assessment and Collection of Regulatory Fees for the Fiscal Year 2014, Assessment and Collection of Regulatory Fees for the Fiscal Year 2013, Procedures for Assessment and Collection of Regulatory Fees*, MD Docket Nos. 14-92, 13-140, 12-201, Notice of Proposed Rulemaking, Second Further Notice of Proposed Rulemaking, and Order (rel. June 13, 2014).

² *Id.*

³ *Assessment and Collection of Regulatory Fees for the Fiscal Year 2014, Assessment and Collection of Regulatory Fees for the Fiscal Year 2013, Procedures for Assessment and Collection of Regulatory Fees*,

Those comments in particular contain significant points to which ACA and others will be responding. Moreover, ACA and its counsel are small organizations with limited resources that are currently devoted to several other pending proceedings.⁴

The requested extension will provide the time necessary for interested parties to respond to significant points raised in other comments and will allow the Commission to develop a more complete record on the equitable allocation of regulatory fees to the DBS providers. Moreover, the requested one-week extension would not harm or prejudice the Commission or any interested parties, since it is unlikely to delay the proceeding in any meaningful way.

MD Docket Nos. 14-92, 13-140, 12-201, Comments of DIRECTV, LLC and DISH NETWORK L.L.C. (filed July 8, 2014).

⁴ Most immediately, ACA and its counsel are immersed in preparing comments in the Commission's Open Internet proceeding *Protecting and Promoting the Open Internet*, GN Docket No. 14-28, Notice of Proposed Rulemaking (rel. May 15, 2014). Those comments are due July 15, one day after the deadline for filing reply comments in this proceeding. ACA and its counsel are also engaged in other proceedings with fast-approaching filing deadlines. See, e.g., *Closed Captioning of Video Programming, Telecommunications for the Deaf and Hard of Hearing, Inc. Petition for Rulemaking*, CG Docket No. 05-231, Report and Order, Declaratory Ruling, and Further Notice of Proposed Rulemaking (rel. Feb. 24, 2014) (comments due July 9); *Amendment of the Commission's Rules Related to Retransmission Consent*, MB Docket No. 10-71, Report and Order and Further Notice of Proposed Rulemaking (rel. March 31, 2014) (reply comments due July 24 following the Media Bureau's grant of an interested party's request for extension of time). In addition, ACA and its counsel are preparing to participate in the license transfer or assignment reviews involving Comcast-Time Warner Cable and AT&T-DIRECTV. See Public Notice, DA 14-479, Commission Announces that the Applications Proposing the Transfer of Control of the Licenses and Authorizations Held by Time Warner Cable, Inc., and its Subsidiaries to Comcast Corporation Have Been Filed and Permit-but-Disclose Ex Parte Procedures Now Apply, MB Docket No. 14-57 (Apr. 8, 2014); Public Notice, DA 14-803, Commission Opens Docket for Proposed Transfer of Control of DIRECTV to AT&T Inc., MB Docket No. 14-90, (Jun. 11, 2014). Although the Commission has not yet released Public Notices establishing the pleading cycles in either proceeding, ACA has been diligently evaluating the lengthy Public Interest Statements associated with each set of applications and initiating its analysis.

For the foregoing reasons, ACA requests a one-week extension of time for all parties to file reply comments in this proceeding.

Respectfully submitted,

AMERICAN CABLE ASSOCIATION

By: 

Matthew M. Polka
President and Chief Executive Officer
American Cable Association
One Parkway Center
Suite 212
Pittsburgh, Pennsylvania 15220

(412) 922-8300

Ross J. Lieberman
Senior Vice President of Government
Affairs
American Cable Association
2415 39th PI, NW
Washington, DC 20007

(202) 494-5661

July 9, 2014

Barbara S. Esbin
Jacob E. Baldwin
Cinnamon Mueller
1875 Eye Street, NW
Suite 700
Washington, DC 20006

(202) 872-6811

Attorneys for American Cable Association