

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

In the Matter of)
)
Petition for Rulemaking to Amend the) RM 11728
Commission's Rules Governing) MB Docket No. 14-__
Practices of Video Programming Vendors)



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

The American Cable Association (“ACA”) files this Motion seeking a one-month extension of time for parties to file comments concerning the Petition for Rulemaking filed by Mediacom Communications Corporation (“Mediacom”) on July 21, 2014 (“Petition”).

On July 29, 2014, the Commission released a Public Notice soliciting public statements opposing or supporting the Petition.¹ By regulation, the Notice establishes August 28, 2014 as the deadline for filing comments, with reply comments to be filed 15 days later.² For the reasons described below, ACA seeks a one-month extension for parties to file comments.

ACA requests this extension to ensure that it and other interested parties have time to fully develop the record in response to the Petition. Mediacom has asked the Commission to consider and adopt specific rules to prevent entities that sell video programming to multichannel video programming distributors (“MVPDs”) from engaging in certain unfair and anticompetitive practices. The Petition seeks action on key areas of reform concerning broadcast signal and cable programming network carriage under the retransmission consent and program access rules that will require serious and careful study and evaluation by all interested parties.

Moreover, ACA and its counsel are small organizations with limited resources that are currently

¹ Public Notice, Report No. 3008 (July 29, 2014).

² 47 C.F.R. §§ 1.401; 1.405 (Responses to petitions; replies).

devoted to several other pending proceedings.³

ACA requests a one-month extension so that the initial comment filing deadline for the Petition does not overlap with other significant filing deadlines for the same set of participants and does not fall over the upcoming Labor Day holiday. The requested extension will provide the time necessary for interested parties to respond to significant points raised in the Petition and will allow the Commission to develop a more complete record on these issues of vital import to MVPDs and programming vendors alike.

³ Most immediately, ACA and its counsel are engaged in the Commission's 2014 Quadrennial Media Ownership Review proceeding, with comments due August 6, 2014 and reply comments due September 8, 2014. See *2014 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*; *2010 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*; *Promoting Diversification of Ownership in the Broadcasting Services*, Order, MB Docket Nos. 14-50, 09-182, 07-294 (rel. June 27, 2014). ACA and its counsel are also engaged in other proceedings with fast-approaching filing deadlines. ACA and its counsel are preparing to participate in the license transfer or assignment reviews involving Comcast-Time Warner Cable and AT&T-DIRECTV. Initial comments/petitions are due in the Comcast-TWC proceeding on August 25, 2014; responses on September 23rd and replies on October 8th. See Public Notice, DA 14-986, *Commission Seeks Comment on Applications of Comcast Corporation, Time Warner Cable Inc., Charter Communications, Inc., and Spinco to Assign and Transfer Control of FCC Licenses and Other Authorizations*, MB Docket No. 14-57 (rel. July 10, 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 (rel. Jun. 11, 2014). In addition, 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). The record in this proceeding already exceeds 1 million comments, and reply comments are due September 10, 2014. Although the Commission has not yet released a Public Notice establishing the pleading cycle in the AT&T-DIRECTV proceeding, ACA has been diligently evaluating the Public Interest Statements associated with each set of applications, and is analyzing each in terms of potential public interest harms affecting its members and remedies needed to address these harms.

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

Respectfully submitted,

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