

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Fox Television Stations, Inc.)	MB Docket No. 07-260
)	
)	
Application for Renewal of License of)	File No. BRCT-20070201AJT
WWOR-TV, Secaucus, New Jersey)	
)	
&)	
)	
Application for Renewal of License of)	File No. BRCT-20070201AJS
WWNY-TV, New York, New York)	

MOTION FOR EXTENSION OF TIME TO FILE APPLICATION FOR REVIEW

The Office of Communication of the United Church of Christ (“UCC OC, Inc.”), Rainbow/PUSH Coalition, Free Press, and Voices for New Jersey (collectively, “Movants”), through counsel, respectfully request a 30-day extension of time from September 8, 2014 to October 8, 2014 in which to file Applications for Review of the Media Bureau’s Order in the above-referenced matter.¹ Movants have three separate counsel, all of whom are currently working on several Commission matters due on or around September 8th. Additional time is

¹ *Fox Television Stations, Inc., Application for Renewal of License WNYW-TV and WWOR-TV and Supplemental Petition for Modification of Permanent Waiver*, Memorandum Opinion and Order, MB Dkt. No. 07-260 (Aug. 8, 2014). Motions for Extension of Time are governed by 47 C.F.R. § 1.46.

necessary to consult with the Movants and coordinate their responses prior to the deadline for Applications for Review.²

The Institute for Public Representation (“IPR”) serves as counsel for Petitioners UCC OC, Inc. and Rainbow/PUSH. IPR is a small legal clinic based at Georgetown University Law Center (“Georgetown Law”) that provides free legal services to nonprofit public interest organizations on communications and technology law issues. IPR depends on law students to assist with the legal representation of its clients. Currently the clinic has no students because Georgetown Law does not resume classes until September 2, 2014.

IPR is already working on two other proceedings that have filings due September 8th: (1) the 2014 Quadrennial Review of the Commission’s ownership rules and (2) a Petition for Rulemaking seeking to expand online public file obligations.³ IPR also represents clients who intervened in the U.S. Court of Appeals for the District of Columbia to support the Commission’s recent Interstate Inmate Calling Service Order.⁴ The Intervenors’ brief is due in the coming weeks, pending a forthcoming scheduling order from the Court.

Andrew Jay Schwartzman represents Voices for New Jersey. Mr. Schwartzman joined IPR in January 2014 and he is working on the same projects above.

² 47 C.F.R. § 1.115(d) states that an “application for review . . . shall be filed within 30 days of public notice of such action.” An Application for Review of the Media Bureau’s decision in this case is therefore due on September 8, 2014.

³ *2014 Quadrennial Regulatory Review, Extension of Comment and Reply Deadlines*, MB Dkt. 14-50 (June 27, 2014); *Media Bureau Seeks Comment on Petition for Rulemaking Seeking Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Also Seeks Comment on Expanding Online Public File Obligations to Radio Licensees*, MB. Dkt. No. 14-127 (Aug. 7, 2014).

⁴ *Securus Technologies, Inc. v. FCC*, No. 13-1280 (D.C. Cir. 2014). The Court suspended the briefing schedule for the case on July 31, 2014.

Free Press is a small nonprofit organization that is working on reply comments in the 2014 Quadrennial Review as well as several other pending Commission matters due at roughly the same time. These include the proposed mergers of (1) Comcast with Time Warner Cable and (2) AT&T with DIRECTV and (3) the Open Internet rulemaking.⁵

On top of the various Commission proceedings coinciding with the Application for Review deadline, counsel for Movants had previously scheduled vacations in August. As a result, counsel do not have the resources available to meet an early September deadline.

Petitioners therefore respectfully ask that the Commission extend the deadline for filing an Application for Review in this case until October 8, 2014.

Respectfully submitted

/s/

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August 12, 2014

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⁵ *Commission Seeks Comment on Applications of Comcast Corporation and Time Warner, Inc. to Assign and Transfer FCC Licenses*, MB Dkt. No. 14-57 (July 10, 2014) (comments due Aug. 25, 2014); *Commission Seeks Comment on Applications of AT&T Inc. and DIRECTV to Transfer FCC Licenses*, MB Dkt. No. 14-90 (Aug. 7, 2014) (comments due Sept. 16, 2014); *Protecting and Promoting the Open Internet*, Notice of Proposed Rulemaking, Dkt. No. 14-28 (May 15, 2014) (reply comments due Sept. 10, 2014).

CERTIFICATE OF SERVICE

I, Niko Perazich, Office Manager, Institute for Public Representation, do hereby certify that, on August 12, 2014, pursuant to 47 C.F.R. §1.47(f), a copy of the forgoing Motion For Extension of Time to File Application for Review was served by first class U.S. mail, postage prepaid, upon 21st Century Fox, Inc. at the address below.

Jared S. Sher
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Niko Perazich
August 12, 2014