

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20015



In re:)
)
APPLICATIONS OF COMCAST CORPORATION,) Docket 10-56
GENERAL ELECTRIC COMPANY, AND NBC)
UNIVERSAL, INC., TO ASSIGN AND)
TRANSFER CONTROL OF FCC LICENSES)

REQUEST FOR EXTENSION OF TIME

Media Access Project (“MAP”) respectfully requests a forty-five day extension of time through and including June 17, 2010 within which to file petitions to deny, oppositions and comments in the above-captioned matter. Under this schedule, oppositions would be due July 16, 2010 and replies would be due August 1, 2010.

In preparing this request, MAP has consulted with more than a dozen public interest, carrier, satellite, labor, programmer and other organizations who agree with this prayer for relief. However, in the interest of expedition, MAP is submitting this request on its own behalf.

The principal basis for this request is that the Commission has established an unusually large number of filing deadlines in important proceedings over the next two months, and it is impossible for affected organizations to participate in those proceedings while also preparing the detailed submissions necessary to assist the Commission in resolving this complex and extremely important matter.

MAP recognizes that the Commission has already provided a somewhat longer than usual period of time within which to file oppositions. However, this is nonetheless too rapid a schedule to allow creation of a full record.

There are numerous filing deadlines for a number of important proceedings between now and mid-May. These include the following:

Preserving the Open Internet (Docket 09-191): Reply Comments Due April 8

Retransmission Consent (Docket 10-71): Comments Due April 19, 2010

Comcast/NBCU Proceeding (Docket 10-56): Oppositions Due May 3

Retransmission Consent (Docket 10-71): Reply Comments Due May 4

Future of Media Inquiry (Docket 10-25): Comments Due May 7

Ex Parte Rules (Docket 10-43): Comments Due Approximately May 15¹

Procedural Rules Reform (Docket 10-44): Comments Due Approximately May 15

MAP and other organizations seeking to participate in this proceeding have been preoccupied with assisting the Commission in the preparation of its National Broadband Plan, which has necessitated delaying work on other matters until the past week. Their limited resources will be fully utilized addressing the heavy schedule of filings listed here. It is simply impossible for them to add the Comcast/NBC matter to this agenda without truncating work on some or all of the other proceedings.

Moreover, while most elements of Comcast's applications were filed in January, the most important parts of the applications - the economic analyses - were not filed until about March 5, and only became available for review on or about March 19. In addition, redacted parts of the applications have not been available, and there will be additional delay while appropriate individuals comply with the Commission's recently published protective orders to obtain access.

The need for additional time is especially important in this proceeding because the Commission has taken the unusual - and highly laudable - step of warning affected parties that all relevant arguments in this proceeding must be presented during the pleadings phase and that the Commission will not tolerate introduction of new issues by means of *ex parte* presentations. This makes it all the

¹MAP has been informally advised that the *Federal Register* notice for Dockets 10-43 and 10-44 will be published during the week of March 22.

harder to prepare and submit complete oppositions within the filing deadline.

WHEREFORE, MAP respectfully requests that the Commission establish new filing deadlines for this proceeding as set forth above, and grant all such other relief as may be just and proper.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Andrew Jay Schwartzman". The signature is fluid and cursive, with the first name "Andrew" being the most prominent.

Andrew Jay Schwartzman

March 22, 2010