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**Jeremy M. Kissel**  
Admitted in Illinois, Florida, and District of Columbia

July 23, 2010

Marlene H. Dortch  
Federal Communications Commission  
Office of the Secretary  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**Via Federal Express and ECFS**

**Re: In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees, MB Docket No. 10-56; Motion for Extension of Time to File Replies to Responses/Oppositions**

Dear Ms. Dortch:

On Behalf of the American Cable Association ("ACA"), we enclose an original and four copies of the Motion for Extension of Time to File Replies to Responses/Oppositions. We are also filing the Motion electronically via ECFS.

We also enclose an additional copy of this filing and request that you have it date-stamped and returned in the enclosed postage-paid envelope.

Please contact us with any questions,

Sincerely,



Jeremy M. Kissel  
Counsel for American Cable Association

Enclosures

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

In the Matter of )  
)  
)

Applications of Comcast Corporation, )  
General Electric Company, and NBC )  
Universal, Inc., to Assign and Transfer )  
Control of FCC Licenses )  
)  
)

MB Docket No. 10-56



**MOTION FOR EXTENSION OF TIME  
TO FILE REPLIES TO RESPONSES/OPOSITIONS**

The American Cable Association ("ACA") files this Motion for Extension of Time seeking a two week extension to file Replies to Responses/Oppositions in the above-referenced proceeding.

On May 5, 2010, the Media Bureau released a Public Notice announcing a revised pleading schedule for its review of the applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc. (hereinafter, "Applicants"), to assign and transfer control of FCC licenses.<sup>1</sup> As part of the *Scheduling Notice*, the Media Bureau indicated that Responses to Comments/Oppositions to Petitions and Replies to Responses/Oppositions were due on July 21, 2010 and August 5, 2010, respectively.<sup>2</sup> For the reasons described below, ACA seeks a two week extension to file Replies to Responses/Oppositions.

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<sup>1</sup> *Commission Announces Revised Pleading Schedule for its Review of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc., To Assign and Transfer Control of FCC Licenses*, MB Docket No. 10-56, DA 10-636, 24 FCC Rcd. 4407 (2010) ("*Scheduling Notice*").

<sup>2</sup> *Id.*

While Responses to Comments/Oppositions to Petitions were due on July 21, 2010, public access to the redacted version of Applicants' Opposition to Petitions to Deny and Response to Comments on the Commission's electronic comment filing system was delayed until late in the evening on Thursday, July 22, 2010. As a result of the delay, ACA and other interested parties, with far less resources than Comcast,<sup>3</sup> will have less than 14 days to complete their review of the approximately 599 pages of material comprising Applicants' response and prepare their Reply Comments in accordance with the *Scheduling Notice*.<sup>4</sup> To assist the Commission in its review of the transaction, all interested parties must have sufficient time to review and evaluate Applicants' voluminous filing – almost half of which consists of economic studies and analyses of the proposed joint venture.

The task will be complicated by the fact that ACA representatives who have executed Acknowledgements of Confidentiality pursuant to the *First Protective Order*<sup>5</sup> and *Second Protective Order*<sup>6</sup> did not receive the unredacted version of Applicants' filing containing highly confidential material until late in the evening on July 22, 2010.<sup>7</sup> It

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<sup>3</sup> Applicants' Opposition to Petitions to Deny and Response to Comments was prepared by, at a minimum, 25 attorneys and economists.

<sup>4</sup> To clarify, ACA is not taking issue with the magnitude of Applicants' extensive filing. The focus of this Motion for Extension of Time is to ensure that ACA and other interested parties have sufficient time to address the substance of Applicants' filing.

<sup>5</sup> *In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc., to Assign and Transfer Control of FCC Licenses*, Protective Order, MB Docket No. 10-56, DA 10-370, 25 FCC Rcd. 2133 (2010).

<sup>6</sup> *In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc., to Assign and Transfer Control of FCC Licenses*, Protective Order, MB Docket No. 10-56, DA 10-371, 25 FCC Rcd. 2140 (2010).

<sup>7</sup> ACA formally requested copies of Applicants' unredacted filing via email on Wednesday, July 21, 2010,

is also our understanding that other ACA representatives who are entitled to view Applicants' highly confidential material will not receive an unredacted copy of Applicants' filing until Friday, July 23, 2010. For ACA, this already daunting task will be further complicated by injuries suffered by ACA's economic consultant, Professor William P. Rogerson, in a recent accident. As a result of these injuries, Professor Rogerson – whose testimony in the proceeding is critical to ACA's analysis of the competitive harms of the proposed transaction<sup>8</sup> – is scheduled to undergo surgery on July 26, 2010.

In light of the foregoing, ACA requests that the Media Bureau grant a two week extension for interested parties to file Replies to Responses/Oppositions.


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at approximately 2:00 PM EST.

<sup>8</sup> In an economic study attached to Applicants' Opposition to Petitions to Deny and Response to Comments, economists Mark Israel and Michael L. Katz focus extensively on the work of Professor Rogerson, devoting approximately 96 pages to refuting his economic analysis of the horizontal and vertical harms of the proposed transaction. See Mark Israel and Michael L. Katz, ECONOMIC ANALYSIS OF THE PROPOSED COMCAST-NBCU-GE TRANSACTION (July 20, 2010), attached as Exhibit 2 to Applicants' Opposition to Petitions to Deny and Response to Comments.

Respectfully submitted,

**AMERICAN CABLE ASSOCIATION**

By:  \_\_\_\_\_

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July 23, 2010

### Certificate of Service

I, Alma Hoxha, paralegal with the law firm of Cinnamon Mueller, hereby certify that copies of the foregoing **Motion for Extension of Time to File Replies to Responses/Oppositions** to be served via USPS mail on this 23rd day of July, 2010 to the following:

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A handwritten signature in black ink, appearing to read 'Alma Hoxha', written over a horizontal line. The signature is cursive and extends to the right of the line.

Alma Hoxha  
Paralegal