

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of }
FCC Seeks Comment on Adopting } GN Docket No. 13-86
Egregious Cases Policy }
)

MOTION FOR EXTENSION OF TIME

The National Association of Broadcasters (NAB)¹ hereby requests that the Commission grant an extension of the deadline for the submission of comments and reply comments in response to the above-captioned Public Notice.² Comments and reply comments currently are due on May 20 and June 18, 2013, respectively. We request an extension of these deadlines to June 19 and July 18, 2013, respectively.

This requested extension is needed for NAB and the broadcast industry to respond fully to the complex policy, legal and constitutional questions raised in this proceeding. The Notice seeks comment on whether the “Commission should make changes to its current broadcast indecency policies or maintain them as they are.” Notice at 1-2 (asking for comment on specific questions about these indecency policies, “as well as any other aspect” of those policies).

NAB and its members have been and continue to be vitally interested in the substance and the application of the broadcast indecency rules and policies. Given the

¹ NAB is a nonprofit trade association that advocates on behalf of free, local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

² *FCC Reduces Backlog of Broadcast Indecency Complaints by 70% (More than One Million Complaints); Seeks Comment on Adopting Egregious Cases Policy*, Public Notice in GN Docket No. 13-86, DA 13-581 (Apr. 1, 2013) (Notice).

importance of these rules, the Commission should allow adequate time for all interested parties to address fully all relevant issues and prepare thorough and thoughtful comments. NAB also needs sufficient time to consider the views of our varied membership and to gather additional information about the impacts of specific policies on radio and television stations and networks.

We observe that previous changes to the Commission's indecency policies nearly a decade ago proved controversial and ultimately produced multiple legal challenges and appeals court decisions, as well as two Supreme Court decisions. Because changes in indecency policies pursuant to this Notice may prove similarly controversial – and certainly raise significant First Amendment and other questions – the comment period must be sufficient to provide all interested parties the time and opportunity to consider and present their views.

Accordingly, NAB requests a 30-day extension of the deadlines for filing initial and reply comments in response to the Notice.

Respectfully submitted,

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