

**Before The
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C.**

In the matter of)
)
Creation of a Low Power Radio Service) MM Docket 99-25
)
)

**MOTION TO EXTEND TIME
OF REPLY COMMENT PERIOD**

1. REC Networks ("REC") is a supporter of locally owned and diverse radio. REC currently operates several Internet only radio stations. REC also operates several websites including the original LPFM Channel Search Tool¹. REC Networks also represents the interests of independently owned Low Power FM ("LPFM") broadcast stations and their listeners. REC also follows issues that involve the availability of media in rural and underserved areas.

2. REC is asking that the Commission extend the comment deadline by 15 days to a 30-day period for the following reasons herein.

3. Large number of comments. REC notes that an extremely large number of comments have been received in this proceeding. While many of these comments are "form comments" there are some independently filed comments within the docket. REC and others need the additional time to review these comments in order to identify these independent comments and provide reply if necessary.

¹ - <http://www.recnet.com/lpfminfo>

4. Reply to paper filed comments. As we have seen first hand with the Motion to Extend Time filed by Station Resource Group², their actual motion did not show up in the ECFS for one week and did not show up until after the Commission took action on their motion. Since this proceeding has a much wider interest than just the communications attorneys who can directly access the Reference Information Center (RIC), it is in the public interest to assure that we have a full record of comments in the ECFS and a reasonable amount of time to prepare replies to those paper filed comments. We feel that the current 15-day reply comment period would not meet the public interest.

5. Inconsistent with other proceedings. We note that another Media Bureau proceeding that addresses city of license issues³ that was recently published in the Federal Register was given a one-month Reply Comment period. We feel that this proceeding should be afforded the same amount of time.

² - We note that although we filed in opposition to Station Resource Group's (SRG) motion to extend time for the *comment* period, we supported National Public Radio's petition to extend the *Reply Comment* period. We feel that based on the interval of time that it took for the RIC to post the SRG motion into ECFS, we feel that other paper filings will take this long and with the shortened reply period, some will only have about 7 days to review and prepare replies. We feel this is a new issue that has arisen since the original denial of NPR's petition to extend the Reply period and therefore should be reconsidered.

³ - MB Docket 05-210

6. For the following reasons given, REC is requesting that the Commission extend the Reply Comment period in the above captioned proceeding to September 21, 2005. We feel that this reasonable extension of time will permit members of the public who are not in Washington, DC and wish to reply to all comments, both electronic and paper (scanned) to be able to review the full record and have an adequate amount of time to prepare a reply.

Respectfully Submitted,

/S/ _____
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