

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
 )  
Creation of a Low ) MM Docket No. 99-25  
Power Radio Service ) RM-9208  
 ) RM-9242

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

To: The Commission

**PETITION FOR EXTENSION OF TIME TO FILE REPLY COMMENTS**

Greater Media, Inc. ("Greater Media"), through its attorneys, hereby respectfully requests that the Commission should grant an extension of time from September 1, 1999, for a period of sixty (60) days, to and including November 1, 1999, or for a period of forty-five (45) days after the release of a Notice of Proposed Rule Making respecting implementation of in-band on-channel ("IBOC") digital audio broadcasting ("DAB"), whichever is later, for the filing of reply comments in the above-referenced proceeding. In support thereof, the following is shown:

1. Greater Media has filed comments in this proceeding in opposition to the creation of a new low power FM ("LPFM") service. It has also filed comments in support of the IBOC petition for rulemaking by USA Digital Radio Partners, L.P. (RM-9395). Greater Media has commenced its review of the voluminous comments which were filed with the Commission on August 2, 1999 in this proceeding. Well over a 1000 comments were filed, totaling approximately 7000 pages. Included in these filings were the extensive materials filed by the National Association of Broadcasters ("NAB") in its 600-page Comments, which involve detailed engineering studies on receiver performance. Other receiver studies have also been filed in connection with the submissions by various other commenting parties.

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2. This review process will entail close examination of complicated technical material. In addition, Greater Media and others will be examining in detail the relationship of the proposals in this LPFM proceeding to the prospects for development of IBOC DAB. Part of this review process will likely necessitate the commissioning of new technical studies to assess the adverse impact of LPFM on existing full power stations and the transition to digital broadcasting. Further complicating this review process is the fact that it is difficult to coordinate these examinations with the work and vacation schedules of consultants and principals during the month of August.

3. All of these factors fully warrant extension of the existing deadline date for reply comments, which is less than three weeks away. Greater Media submits that the reply comment deadline dates it proposes are reasonable in light of the unprecedented number of comments filed and the complex technical issues presented. In this connection, Greater Media notes that the Commission itself, in its Order released May 20, 1999 extending the comment and reply comment dates in this proceeding (FCC 99-112) adverted to the close interrelationship between this proceeding and the IBOC DAB proceeding. As the Commission stated, the IBOC

laboratory testing, along with data and analysis that digital radio proponents can make available prior to the completion of field tests, may enable the Commission to identify the range of potential digital radio design parameters and the viability of design options that could ensure compatibility between low power and digital radio services. In addition, we expect that the parties conducting further technical studies will keep us apprised of relevant developments that we may need to consider as we analyze the record in the low power radio proceeding. Finally, we take this opportunity to state our intention to launch a rulemaking proceeding regarding digital radio this summer.

Grant of the requested extension of the reply comment deadline date for a 60-day period or for a 45-day period from the initiation of the IBOC DAB proceeding, which is

expected "this summer", should provide an ample opportunity for completion of comprehensive and useful filings which will focus upon the compatibility of the two services.

WHEREFORE, for all of the foregoing reasons, Greater Media urges the Commission to extend the date for filing reply comments in this proceeding for a period of 60 days, or for a period of 45 days from a release of a Notice of Proposed Rulemaking in the IBOC DAB proceeding, whichever is later.

Respectfully submitted,

GREATER MEDIA, INC.

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