

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

In the Matter of)	
)	
Family Stations, Inc.)	
New FM Translator (Facility ID No. 203018))	FCC File No. BNPFT-20190731AAZ
El Cajon, California)	
)	
Positive Hope Inc.)	
KVIB-LP (Facility ID NO. 197704))	FCC File No. BLP-20190909ABO
San Diego, California)	

To: Office of the Secretary
Attn: Chief Audio Division, Media Bureau

MOTION FOR EXTENSION OF TIME

Pursuant to Section 1.46(c) of the Commission’s rules,¹ Family Stations, Inc. (Family Stations”) respectfully request an extension of time in which to reply to Positive Hope, Inc.’s (“Positive Hope”) Application for Review filed on July 24, 2020 in the captioned matter. Specifically, Family Stations asks that the deadline to respond to the Application for Review to August 13, 2020.

Family Stations appreciates that the Commission does not routinely grant extensions of time; however, under the circumstances, Family Stations believes a brief extension is appropriate and will not prejudice any party. As an initial matter, Family Stations’ counsel contacted Positive Hope’s counsel, and counsel for Positive Hope indicated it will impose no objection to this request for an extension of time. Family Stations has also orally notified counsel for Positive Hope and Media Bureau personnel responsible for acting on this Motion of its filing.²

¹ 47 C.F.R. § 1.46.

² See 47 C.F.R. § 1.46(c).

Grant of this Motion is in the public interest because it will ensure the Commission benefits from a fully developed record. The Commission has granted extensions of time for good cause shown³ and when the extension would result in the most complete and well-developed record possible or will allow for more accurate responses.⁴ Grant of the requested extension would fulfill these important public interests.

Finally, grant of the requested extension will neither cause undue delay nor harm any party to the proceeding. As noted above, Positive Hope's counsel has indicated to Family Station's counsel that Positive Hope does not object to the brief extension requested herein. Moreover, a brief seven day extension will not cause significant delay. Therefore, Family Stations respectfully requests that the Commission grant its Motion for Extension of Time and set a new response date of August 13, 2020.

/s/ Matthew H. McCormick
Matthew H. McCormick
Seth L. Williams
Fletcher, Heald & Hildreth, PLC
1300 N. 17th Street
11th Floor
Arlington, VA 22209
(703) 812-0400
mccormick@fhhlaw.com
williams@fhhlaw.com

Counsel for Family Stations, Inc.

August 4, 2020

³ See, e.g., *In re Application of Media General Broadcasting of South Carolina Holdings, Inc. for Renewal of License for Station WBTW(TV), Florence, SC*, Order Granting Extension of Time, 19 FCC Rcd 24744 (MB 2004).

⁴ See, e.g., *In re Amendment of Parts 2 and 25 of the Commission's Rules to Permit Operation of NGSO FSS Systems in the Ku-Band Frequency Range*, Order Extending Reply Comment Period, 16 FCC Rcd 7070 (WTB 2001).

CERTIFICATE OF SERVICE

I, Seth L. Williams, counsel for Family Stations, Inc., state that true copies of the foregoing Motion for Extension of Time were sent by email this 4th day of August 2020, to:

Michael W. Richards
Law office of Michael W. Richards, LC
P.O. Box 5842
Takoma Park, MD 20913

Albert Shuldiner
Chief, Audio Division, Media Bureau
Federal Communications Commission

Christopher Clark
Assistant Chief Audio Division, Media Bureau
Federal Communications Commission

Christine Geopp
Audio Division, Media Bureau
Federal Communications Commission

Jim Bradshaw
Association Chief
Audio Division, Media Bureau
Federal Communications Commission

/s/ Seth L. Williams
Seth L. Williams