

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC**

In re Applications of)
)
TELEMUNDO COMMUNICATIONS)
GROUP, INC.,)
Transferor)
)
and)
)
TN ACQUISITION CORP.,)
Transferee)
)
For Transfer of Control of)
Station KSTS(TV), San Jose,)
California, *et al.*)

File Nos. BTCCT-20011101ABK
et seq.

To: Chief, Mass Media Bureau

OPPOSITION TO MOTION FOR EXTENSION OF TIME

Council Tree Hispanic Broadcasters II, L.L.C. ("Council Tree"), by its attorneys, opposes Paxson Communications Corporation's ("Paxson") Motion For Extension of Time ("Motion") to reply to the Oppositions filed on December 19, 2001 by Council Tree, Telemundo Communications Group, Inc. and National Broadcasting Company, Inc.

As Council Tree demonstrated in its Consolidated Opposition, the Paxson Petition to Deny constitutes a misuse of the Commission's processes and was designed only to delay grant of the captioned applications and to afford Paxson leverage over NBC in an unrelated contractual dispute. As if to prove Council Tree's case, Paxson now requests extension of the pleading cycle, without providing one iota of reasonable justification. ^{1/} The purported basis for Paxson's request is only that "Lowell Paxson . . .

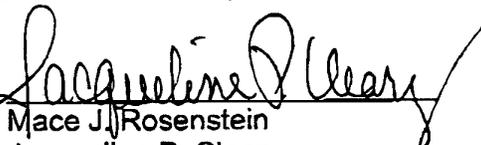
^{1/} Council Tree, in its Opposition, has asked the Commission to resolve these matters expeditiously because of the unique costs of delay – in particular, the denial of the benefits of expanded service to the

is traveling outside of the United States" and that "Paxson's counsel's office will be closed on December 24, December 25 and January 1." However, Paxson knew full well when its Reply would be due at the time it filed its Petition to Deny. Neither Mr. Paxson's unspecified holiday travel plans nor the three day closure of Paxson's counsel's office justifies any delay in this proceeding. Indeed, Paxson already is benefiting from the FCC's procedural rules – rules that already take into account not only the very same holidays during which Paxson's counsel's office will be closed, but also mail delays and weekends 2/ – which in this case have automatically extended the reply period from the five days contemplated by the basic rule to no fewer than *fifteen* days.

Accordingly, Council Tree respectfully urges the Commission to deny Paxson's Motion For Extension of Time.

Respectfully Submitted,

**COUNCIL TREE HISPANIC
BROADCASTERS II, L.L.C.**

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Dated: December 21, 2001

Spanish-speaking community in the United States, and the financial hardship on Council Tree's nearly 27,000 Native American constituents. See Council Tree Opposition at 2-5.

2/ Section 1.4 of the Commission's rules excludes holidays in calculating the deadline for filing a reply. 47 C.F.R. § 1.4.

CERTIFICATE OF SERVICE

I, Charlene Jones, a secretary in the law firm of Hogan & Hartson LLC hereby certify that on this 21st day of December, 2001, a copy of Opposition to Motion For Extension of Time was transmitted by facsimile and delivered by first class mail postage prepaid to:

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