

January 17, 2019

VIA ECFS

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street, NW
Washington, D.C. 20554

Re: **Comments Supporting NAB and NCTA Proposal for Modernizing the Carriage Election Process**
MB Docket No. 17-317

Dear Ms. Dortch:

ION Media Networks, Inc. (“ION”), by its attorneys, hereby files these comments in support for the joint proposal recently filed by the National Association of Broadcasters and NCTA – The Internet and Television Association expressing industry agreement on the best path forward for modernizing the cable carriage election process.¹ The Commission should adopt the Joint Proposal without revision.

ION is one of the largest local television station groups that relies on mandatory carriage to ensure that television viewers can see its programming on cable and satellite systems. Must-carry stations can least afford to undertake additional notification burdens in the carriage election process. The Joint Proposal recognizes this by assigning no notice requirements on must-carry stations beyond what exists today. This is exactly the right approach to take.

Moreover, ION applauds the Joint Proposal’s compromise approach to reducing the administrative and paperwork burdens of the carriage election process. Eliminating the long-outdated certified mail requirement with a modern email notice system is exactly the kind of approach the world’s foremost expert agency on communications matters should take. And creating better, more certain lines of communication between broadcasters and cable operators concerning election issues will inevitably lead to a more cooperative process. The Joint Proposal holds the promise that television stations and cable operators can spend less time making, checking, and disputing carriage elections and more time producing a better product for television viewers and cable consumers. Fewer, less burdensome rules are good for industry, good for competition, and good for American TV viewers.

The Joint Proposal is a win for everyone involved. The Commission should adopt it without delay.

Respectfully submitted,

/s/
John R Feore
Counsel to ION Media Networks, Inc.

¹ Media Bureau Seeks Comment on Industry Proposal for Carriage Election Notice Modernization, *Public Notice*, DA 18-1250, MB Docket No. 17-317, released Dec. 13, 2018 (seeking comment on Letter from Rick Kaplan, General Counsel and Executive Vice President of National Association of Broadcasters (NAB), and Rick Chessen, Chief Legal Officer of NCTA – The Internet and Television Association, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 17-317 (filed Dec. 7, 2018) (the “Joint Proposal”).