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February 1, 2018

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Ex parte* presentation in GN Docket Nos. 17-183, 17-258

Dear Ms. Dortch:

On January 30, 2018, representatives of 21st Century Fox, Inc., Time Warner Inc., Univision Communications Inc., and Viacom Inc.—which, together with CBS Corporation, The Walt Disney Co., and Scripps Networks Interactive, Inc., participate in the above-captioned proceedings as the Content Companies—and the undersigned met with members of the Wireless Telecommunications Bureau, International Bureau, and the Office of Engineering and Technology. A complete list of the participants in this meeting is attached to this letter. The purpose of the meeting was to discuss the future of the 3.7-4.2 GHz and 5.925-6.425 GHz spectrum (“C-band”).

The Content Companies described how they use the C-band to deliver video programming to more than 100 million American television households via cable head-ends, affiliated broadcast television stations, and a growing number of OTT distributors. Put simply, the C-band forms the backbone of the infrastructure for delivering premium video content to consumers throughout the United States. The Content Companies therefore urged the Commission to proceed cautiously and to avoid taking any action that would introduce new operations in the C-band without ensuring that existing uses, including video delivery, would be protected from harmful interference.

With respect to the *Mid-Band Spectrum NOI*, the Content Companies explained that proposals in the record fail to provide sufficient detail to evaluate whether and how they would protect video delivery in the United States. Moreover, the lack of comprehensive data on usage of the band poses a major obstacle to assessing the impact of proposals for new uses of the C-band on video delivery. The Content Companies observed that, absent further details, it would not be possible for the public to provide meaningful comment on developing proposed rules.¹

¹ See, e.g., Reply Comments of NCTA - The Internet & Television Association, GN Docket No. 17-183 at 11–12 (filed Nov. 15, 2017) (explaining that “in order to make a well-informed policy decision regarding the 3.7-4.2 GHz band, the Commission requires access to robust and accurate information about existing C-band operations”).

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The parties discussed the challenges to obtaining such data and areas of inquiry for further development in this respect.

With respect to the *3.5 GHz Band Notice*, the Content Companies urged the Commission to once again reject calls to allow greater out-of-band emissions into the C-band.

Please direct any questions to the undersigned.

Sincerely,

/s/ Matthew S. DelNero
Matthew S. DelNero
Counsel for the Content Companies

cc: Meeting attendees

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MEETING ATTENDEES

Wireless Telecommunications Bureau

Don Stockdale
Dana Shaffer (by phone)
Matthew Pearl
Paul Powell
Blaise Scinto
Tom Derenge (by phone)
Peter Daronco
Becky Schwartz
Ariel Diamond

International Bureau

Jennifer Gilsenan (by phone)
Jose Albuquerque

Office of Engineering and Technology

Julie Knapp
Michael Ha
Jamison Prime
Nick Oros

Content Companies

Kyle Dixon, Time Warner Inc.
Victoria Jeffries, Univision Communications Inc.
Keith Murphy, Viacom Inc.
Jared Sher, 21st Century Fox, Inc.
Matt DelNero, Covington & Burling LLP