



October 23, 2019

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**RE: Notice of Ex Parte Presentation, *In the Matter of Restoring Internet Freedom, MB Docket No. 17-108; In the Matter of the 2018 Quadrennial Regulatory Review, MB Docket No. 18-349; In the Matter of T-Mobile-Sprint, WT Docket No. 18-197***

Dear Ms. Dortch:

Writers Guild of America, West, Inc. (“WGAW” or “Guild”) submits this letter summarizing a meeting held with FCC Commissioner Jessica Rosenworcel and Umair Javed, Legal Advisor, on October 22, 2019 at the WGAW offices in Los Angeles. The following individuals attended the meeting for the WGAW: Allison Abner, Laura Blum-Smith, Angelina Burnett, Francesca Butler, Marjorie David, Sheva Diagne, Jonathan Fernandez, Corrina Freedman, Ashley Gable, Angela Harvey, Rebecca Kessinger, Dexter Kim, Neal Sacharow, Tony Segall, Steve Skrovan, Ellen Stutzman, Jennifer Suh, Marvin Vargas, Patric M. Verrone and David Young.

In the meeting, WGAW members discussed their opposition to the 2017 repeal of the Open Internet Order, which has spurred anticompetitive conduct among ISPs. WGAW highlighted the importance of the open Internet in the dramatic growth of video programming, which increased both content competition and consumer choice. Guild members explained how a free and open Internet allowed traditionally marginalized voices to bypass content gatekeepers and reach viewers directly, and that without net neutrality, this important growth will diminish. As free speech advocates, Guild members discussed the continued importance of preventing a handful of powerful companies from controlling the flow of information over the Internet.

WGAW reiterated its opposition to any action by the FCC to repeal or weaken the Dual Network Rule, which currently prevents common ownership of any two of the four major broadcast networks.<sup>1</sup> Horizontal and vertical mergers have given a small handful of companies almost complete control over the programming seen by American television audiences, diminishing diversity and choice. A merger among the four major broadcast networks would further diminish media plurality in this valuable market. The FCC has an obligation to uphold the public interest in an open and pluralistic broadcast system, and should support this obligation by retaining the Dual Network Rule.

WGAW also discussed its opposition to the Sprint-T-Mobile merger, which will leave the national wireless market in the hands of three companies. The reduction from four to three major wireless carriers in an already highly concentrated market poses significant harm to consumers and content creators. The three major wireless carriers will now have a greater ability to raise prices, limit consumer data and exercise gatekeeper power over online video, harming mobile video markets. As the mobile video market continues to grow, this merger would threaten that pro-consumer growth of video consumption on wireless devices.

Finally, WGAW discussed its concerns about increased consolidation across the media and telecom sector, which strengthens the ability of existing gatekeepers to control content that consumers can access. As longtime advocates for increased competition in this sector, WGAW is particularly concerned about the current consolidated landscape in which a few companies control content and distribution. The WGAW discussed the failures of the existing merger review and enforcement regime and the need for retrospective reviews of media mergers that have significant anticompetitive effects.

Pursuant to Section 1.1206 of the Commission's rules, 47 C.F.R. § 1.1206, this letter is being filed via ECFS, and a copy will be provided by email to the individual listed below. Please contact me with any questions regarding this notice.

Respectfully submitted,

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/s/

Corrina Freedman  
Political and Legislative Director  
Writers Guild of America, West, Inc.

cc: Commissioner Jessica Rosenworcel  
Umair Javed

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<sup>1</sup> See Comments of the Writers Guild of America, West, Inc., in the Matter of 2018 Quadrennial Regulatory Review – Review of The Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of The Telecommunications Act of 1996, MB Docket No. 18-349 (Apr. 29, 2019).