

October 25, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street SW
Washington, DC 20554

**Re: Electronic Delivery of MVPD Communications; Modernization of Media
Regulation Initiative; MB Docket Nos. 17-317 & 17-105**

Dear Ms. Dortch,

On October 23, 2018, Jordan Goldstein of Comcast Corp., Maureen O’Connell of Charter Communications, and I, of NCTA, met with Erin McGrath, Commissioner O’Rielly’s Legal Advisor. On October 24, 2018, we met with Evan Swartztrauber, Commissioner Carr’s Policy Advisor.

Consistent with NCTA’s written comments in the above-captioned proceeding, we explained that modernizing delivery of all subscriber notices would benefit consumers, have positive environmental effects, and reduce unnecessary costs.

We discussed additional ways to reduce the amount of paper – totaling more than 50 million pages and weighing more than 295 tons for just the 2018 annual notice for a single large operator¹ -- that must be sent to customers where email notification is not feasible. For example, the Commission should clarify that operators may provide customers with a written notice that directs customers to web addresses for certain required information (e.g., rate cards or channel line-ups) that is available on their company websites.

We also asked the Commission to provide operators the flexibility to use electronic means to provide mandatory notifications. We noted that customers that wish to receive paper copies would have the option of continuing to do so.

¹ See also *In the Matter of NCTA and ACA, Petition for Declaratory Ruling*, 32 FCC Rcd 5269 (2017) at ¶ 5 (citing to NCTA/ACA Petition) (noting that the industry printed “hundreds of millions of pages of paper annually” to comply with the notice requirements found in Section 76.1602(b)).

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Respectfully submitted,

/s/ Diane Burstein

Diane Burstein

cc: Erin McGrath
Evan Swartztrauber