

March 25, 2019

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BY ELECTRONIC DELIVERY

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20054

Re: Notice of Ex Parte Presentation
Modernization of Media Regulation Initiative
MB Docket No. 17-105

Dear Ms. Dortch:

On March 21, 2019, Maureen O’Connell of Charter Communications, Inc. (“Charter”), Barry Ohlson of Cox Enterprises, Inc., Diane Burstein of NCTA – The Internet and Television Association (“NCTA”), and the undersigned on behalf of Charter met with Sarah Whitesell, Brendan Holland, and Jake Riehm of the Media Bureau, and Andrew Wise and Rodger Woock of the Office of Economics and Analytics.

At the meeting, we discussed the cable industry’s proposal to reduce the reporting burdens of the price survey. We explained that a biennial survey of prices covering the year immediately prior to the survey would still provide the Commission and ultimately the public with information on rate trends for inclusion in the biennial Communications Marketplace Report without sacrificing the quality of the survey data.¹ We also suggested that the Commission should consider offering the option of a simplified survey form for cable operators with uniform national pricing for their cable services. We pointed out that the purpose of the survey was to provide a comparison between the average prices charged by systems subject to effective competition and those not

¹ See Comments of NCTA – The Internet and Television Association, MB Docket No. 17-105, at 23 (filed July 5, 2017) (“NCTA Comments”) (noting that the Media Bureau itself has determined that shifting the reporting requirement to every two years could reduce burdens while fulfilling the intent of the statute).

subject to effective competition,² and that such a comparison is far less meaningful in today's video marketplace, where cable rates are presumptively deemed subject to effective competition in 48 states, than when the rate survey was first mandated by Congress. Nonetheless, as NCTA has noted,³ cable operators must devote significant resources to completing the survey each year.

Please contact the undersigned if you have any questions about this matter.

Sincerely,

/s/ Howard J. Symons

Howard J. Symons

cc: Sarah Whitesell
Brendan Holland
Jake Riehm
Andrew Wise
Rodger Woock

² See 47 U.S.C. § 543(k)(1).

³ NCTA Comments at 23.