



April 8, 2019

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Notice of *Ex Parte* Communication, MB Docket Nos. 17-317, 17-105

Dear Ms. Dortch:

On Thursday, April 5, Emmy Parsons and the undersigned, both of the National Association of Broadcasters (NAB), met with Michelle Carey and Lyle Elder of the Media Bureau to discuss the Commission's efforts to modernize the broadcaster carriage election rules. NAB reiterated arguments consistent with those previously filed in this proceeding.¹ Specifically, NAB emphasized that the Commission should adopt the joint NAB/NCTA proposal and apply it to all multichannel video programming distributors, including direct broadcast satellite (DBS) providers. Contrary to the DBS providers' assertion,² NAB and NCTA developed the proposal with the express goal of increasing efficiency and certainty for all parties. The DBS providers have offered no cogent reason for the Commission to continue with the same carriage election notification process, which is significantly out-of-step with the FCC's laudable efforts to streamline unnecessary burdens on regulated entities.

The joint proposal is a dramatic improvement over the Commission's current rules, and it will benefit all parties –DBS providers included. NAB appreciates the Commission's work on this issue, and we look forward to a modernized carriage election process that reflects the tremendous benefits of the digital age.

Respectfully submitted,

Rick Kaplan
General Counsel and Executive Vice President

¹ Comments of NAB, MB Docket Nos. 17-317, 17-105 (Mar. 26, 2019).

² See, e.g., Joint Comments of DIRECTV, LLC and DISH Network L.L.C., MB Docket No. 17-317, at 2 (Mar. 18, 2019)

Legal and Regulatory Affairs

cc: Michelle Carey, Lyle Elder