



The Internet & Television Association  
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May 21, 2018

**Ex Parte**

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

**Re:   *Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz,  
GN Docket No. 17-183; Expanding Flexible Use of the 3.7 GHz to 4.2 GHz  
Band, GN Docket No. 18-122***

Dear Ms. Dortch:

On May 17, 2018, Colleen King of Charter Communications, Inc., Brian Josef of Comcast Corporation, and Keith Murphy of Viacom Inc., and Rick Chessen, Jacqueline Clary and myself of NCTA – The Internet and Television Association (“NCTA”) met with Michelle Carey, Thomas Horan, John Wong, and Sean Yun of the Media Bureau regarding the above-referenced proceedings.

During the meeting, NCTA and its member companies described the industry’s use of C-band spectrum in cable television distribution systems, focusing on the 3.7-4.2 GHz downlink spectrum, as set forth in the attached diagram. We highlighted that content companies rely on C-band to ensure reliable programming distribution to more than 100 million American TV households, via thousands of MVPD head ends, more than 1,000 broadcast affiliate stations, and over-the-top video distributors. We also noted that cable operators receive a significant amount of the programming they deliver to 51.9 million cable video customers using the 3.7-4.2 GHz band, relying on thousands of receive-only antennas, many of which are unregistered today. We discussed stakeholder proposals to enable expanded terrestrial wireless use of the band, including our assessment that neither fiber nor Ku-band spectrum would be an adequate, complete substitute for today’s C-band operations. We also stated that the Commission should avoid prematurely endorsing any particular proposal until it develops a comprehensive record demonstrating how the band’s existing services will be protected and incumbent users made whole.

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Please address any questions regarding the foregoing to the undersigned.

Sincerely,

**/s/ Danielle J. Piñeres**

Danielle J. Piñeres

Encl.

cc: Michelle Carey  
Thomas Horan  
John Wong  
Sean Yun

# CABLE VIDEO DISTRIBUTION

