



The Internet & Television Association  
25 Massachusetts Avenue, NW | Suite 100  
Washington, DC 20001  
(202) 222-2300

**Danielle Piñeres**  
Vice President & Associate General Counsel

o (202) 222-2459 e [dpineres@ncta.com](mailto:dpineres@ncta.com)

June 13, 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 June 11, 2018, representatives from NCTA – The Internet & Television Association (NCTA) and several of its member companies (listed below) met with Erin McGrath, Legal Advisor, Wireless, Public Safety, and International to Commissioner Michael O’Rielly, Will Adams, Legal Advisor to Commissioner Brendan Carr, and Umair Javed, Legal Advisor, Wireless and International to Commissioner Rosenworcel, regarding the above-referenced proceedings. On June 13, 2018, representatives from NCTA and member companies met with Rachael Bender, Wireless and International Advisor to Chairman Ajit Pai.

During the meetings, 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 presentation, and noting other uses such as delivering broadband and telephone services in remote locations. Specifically, we 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, via thousands of receive-only antennas, many of which are unregistered today. We also highlighted that content companies rely on C-band to ensure reliable programming distribution – including breaking news and live sporting and entertainment events – 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 responded to proposals to enable expanded terrestrial wireless use of the band, emphasizing our assessment that neither fiber nor Ku-band spectrum would be an adequate, complete substitute for today’s C-band operations, nor would such substitution be feasible in many use cases. We raised questions about the costs and technical issues associated with

Ms. Marlene H. Dortch  
June 13, 2018  
Page 2

repacking the band, including earth station filtering and associated expenses. 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.

Please address any questions regarding the foregoing to the undersigned.

Sincerely,

/s/ **Danielle J. Piñeres**

Danielle J. Piñeres

Encl.

cc: Will Adams  
Rachael Bender  
Umair Javed  
Erin McGrath

**Industry Attendees**

*Will Adams Meeting, June 11, 2018*

CBS Corporation – Anne Lucey  
Charter Communications, Inc. – Colleen King  
Comcast Corporation – Brian Josef  
Covington & Burling LLP – Matthew DelNero (counsel to the Content Companies)  
Cox Enterprises, Inc. – Barry Ohlson  
General Communication, Inc. – Kara Azocar  
NCTA – The Internet & Television Association – Jacqueline Clary & Danielle Piñeres  
Time Warner Inc. – Kyle Dixon  
Univision Communications, Inc. – Victoria Jeffries

*Umair Javed Meeting, June 11, 2018*

CBS Corporation – Anne Lucey  
Charter Communications, Inc. – Colleen King  
Comcast Corporation – Brian Josef  
Covington & Burling LLP – Matthew DelNero (counsel to the Content Companies)  
Cox Enterprises, Inc. – Barry Ohlson  
Discovery, Inc. – Catherine Carroll  
General Communication, Inc. – Kara Azocar  
NCTA – The Internet & Television Association – Jacqueline Clary & Danielle Piñeres  
Time Warner Inc. – Kyle Dixon  
Univision Communications, Inc. – Victoria Jeffries  
Viacom Inc. – Keith Murphy

Ms. Marlene H. Dortch

June 13, 2018

Page 3

*Erin McGrath Meeting, June 11, 2018*

CBS Corporation – Anne Lucey

Charter Communications, Inc. – Colleen King

Comcast Corporation – Brian Josef

Covington & Burling LLP – Matthew DelNero (counsel to the Content Companies)

Cox Enterprises, Inc. – Barry Ohlson

Discovery, Inc. – Catherine Carroll

General Communication, Inc. – Kara Azocar

NCTA – The Internet & Television Association – Jacqueline Clary & Danielle Piñeres

Time Warner Inc. – Kyle Dixon

Viacom Inc. – Keith Murphy

*Rachael Bender Meeting, June 13, 2018*

CBS Corporation – Anne Lucey

Charter Communications, Inc. – Colleen King

Comcast Corporation – Brian Josef

Covington & Burling LLP – Matthew DelNero (counsel to the Content Companies)

Cox Enterprises, Inc. – Barry Ohlson

Discovery, Inc. – Catherine Carroll

ESPN, Inc. – Amy Klein

General Communication, Inc. – Kara Azocar

NCTA – The Internet & Television Association – Jacqueline Clary & Danielle Piñeres

Univision Communications, Inc. – Victoria Jeffries

The Walt Disney Company – Susan Fox

Viacom Inc. – Keith Murphy