



June 28, 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. 18-202, 17-317 & 17-105

Dear Ms. Dortch:

On Wednesday, June 26, the undersigned of the National Association of Broadcasters (NAB) spoke by phone with Alexander Sanjenis, acting media advisor for Chairman Ajit Pai, to discuss the Commission's draft orders regarding children's television programming rules and electronic delivery of carriage election notices.<sup>1</sup>

NAB thanked Mr. Sanjenis for the Commission's efforts to modernize these rules. Modernizing these rules will provide television broadcasters meaningful relief from regulatory burdens that are unnecessary in light of technological advances and marketplace changes. With respect to the Commission's carriage election rules, NAB reiterated that the proposed revised rules will greatly decrease burdens for television broadcasters and increase certainty for both broadcasters and multichannel video programming distributors.<sup>2</sup> NAB also emphasized that by extending the proposed rules to satellite providers,<sup>3</sup> the Commission will meaningfully decrease the risk of confusion without increasing any burden on any stakeholder.

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<sup>1</sup> See *Children's Television Programming Rules*, Public Draft, Report and Order and Further Notice of Proposed Rulemaking, MB Docket Nos. 18-202, 17-105, FCC-CIRC1907-06 (June 19, 2019) (Draft Children's TV Order); *Electronic Delivery of MVPD Communications*, Report and Order and Further Notice of Proposed Rulemaking, MB Docket Nos. 17-317, 17-105, FCC-CIRC1907-07 (June 19, 2019) (Draft Carriage Order).

<sup>2</sup> See Comments of the National Association of Broadcasters, MB Docket Nos. 17-317, 17-105 (Feb. 15, 2018); Reply Comments of the National Association of Broadcasters, MB Docket Nos. 17-317, 17-105 (Mar. 2, 2018).

<sup>3</sup> See Draft Carriage Order at ¶¶ 20-23.

NAB and TV broadcasters greatly appreciate the Commission's efforts to modernize these rules. Both draft orders are common-sense and important steps in aligning the Commission's broadcast regulations with the modern marketplace.

Respectfully submitted,

**NATIONAL ASSOCIATION OF BROADCASTERS**

A handwritten signature in black ink, appearing to read "Emmy Parsons", written in a cursive style.

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Emmy Parsons  
Assistant General Counsel  
Legal and Regulatory Affairs

cc: Alexander Sanjenis