



The Voice of America's Broadband Providers

September 5, 2017

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

Re: *Ex Parte* Communication: MD Docket No. 17-134, MB Docket No. 17-179

Dear Ms. Dortch:

On August 31, 2017, Genny Morelli and the undersigned of ITTA met with Nirali Patel of the Office of Commissioner Carr regarding the above-captioned proceedings.¹

Consistent with ITTA's comments in response to the *2017 Regulatory Fees NPRM*,² we reiterated that the Commission should adopt ITTA's long-advocated approach to address the disparity in regulatory fees for Interstate Telecommunications Service Providers (ITSPs) by combining wireless providers into the ITSP regulatory fee category. Should the Commission not choose this approach, we expressed support for an order that would adopt the *2017 Regulatory Fees NPRM*'s proposals for reallocating several Wireline Competition Bureau Full Time Equivalents (FTEs) to another bureau or as indirect FTEs, if not also transfer more Wireline Competition Bureau FTEs to other bureaus as direct FTEs.

With respect to the applications for Sinclair's acquisition of Tribune, we asserted that there are numerous infirmities that render grant of the applications not in the public interest. Among them would be Sinclair's increased ability to leverage its massive size to drive up retransmission consent fees for smaller and new-entrant MVPDs, a very real competitive and consumer harm against the backdrop of Sinclair's demonstrated history of retransmission consent fee negotiation abuses.

¹ *Assessment and Collection of Regulatory Fees for Fiscal Year 2017*, Notice of Proposed Rulemaking, 32 FCC Rcd 4526 (2017) (*2017 Regulatory Fees NPRM*); *Media Bureau Establishes Pleading Cycle for Applications to Transfer Control of Tribune Media Company to Sinclair Broadcast Group, Inc. and Permit-but-Disclose Ex Parte Status for the Proceeding*, Public Notice, 32 FCC Rcd 5481 (MB 2017).

² ITTA Comments, MD Docket No. 17-134 (June 22, 2017).

Ms. Marlene H. Dortch
September 5, 2017
Page 2

Please do not hesitate to contact the undersigned with any questions regarding this submission.

Respectfully submitted,

/s/

Michael J. Jacobs
Vice President, Regulatory Affairs

cc: Nirali Patel