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August 9, 1993

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW, Room 222  
Washington, DC 20554

Re: Notification of Permitted Ex Parte Presentation  
MM Docket No. 92-264

Dear Mr. Caton:

Viacom International Inc. ("Viacom"), by its attorneys and pursuant to Section 1.1206(a)(2) of the Commission's rules, hereby submits an original and one copy of this memorandum regarding a permitted ex parte presentation to the Commission's staff regarding MM Docket No 92-264.

On Monday, August 9, 1993, Lawrence W. Secrest, III, and Wayne D. Johnsen, of this office, met with William H. Johnson and Alexandra M. Wilson of the Commission's staff. The discussion related to Viacom's comments and reply comments filed in response to the Notice of Proposed Rule Making in MM Docket No. 92-264, FCC 92-542 (rel. December 28, 1992), and the Further Notice of Proposed Rule Making in that proceeding, which sought comment on the implementation of Sections 11 and 13 of the Cable Television Consumer Protection and Competition Act of 1992. Those provisions deal with the horizontal and vertical ownership limits, cross-ownership limitations and anti-trafficking provisions.

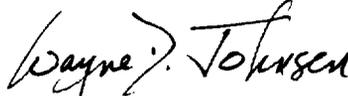
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Mr. William F. Caton  
August 9, 1993  
Page 2

Copies of the attached document were presented to  
Mr. Johnson and Ms. Wilson.

Kindly direct any questions regarding this matter to  
the undersigned.

Respectfully submitted,

A handwritten signature in cursive script that reads "Wayne D. Johnson". The signature is written in dark ink and is positioned above the printed name.

Wayne D. Johnson

WDJ/rr  
Enclosure  
cc: William H. Johnson  
Alexandra M. Wilson

## CHANNEL CAP ISSUES

1. Application only to the vertically integrated cable operators.
2. Grandfather existing carriage.
3. Exempt popular services (e.g., carriage on systems serving 50% of non-affiliated subscribers nationwide).
4. Exempt new services for 5 years.
5. Apply only to national services -- encourage localism.
6. Setting the cap:
  - a. All activated channels (including PEG/must carry/leased access).
  - b. Limit application to 54 channels.
  - c. No more than 50% to commonly-owned/non-exempt services.
  - d. Phase-out where effective competition exists.