



The Internet & Television Association  
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December 20, 2018

**VIA ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
455 12th Street, SW  
Washington, DC 20554

**Re: Channel Lineup Requirements – Sections 76.1705 and 76.1700(a)(4);  
Modernization of Media Regulation Initiative; MB Dkt. Nos. 18-92 & 17-105**

Dear Ms. Dortch:

On December 20, 2018, Diane Burstein and I, of NCTA – The Internet & Television Association, met by telephone with Holly Saurer, Martha Heller, Kim Matthews, and Andrew Manley of the Media Bureau regarding the above-captioned proceeding.

Consistent with NCTA's written comments, we explained that rules requiring cable operators to maintain channel lineups locally and in online public files have outlived their usefulness and should be repealed.<sup>1</sup> We noted that the rules are outdated relics of the Commission's earliest cable technical standards, and that consumers and regulators have convenient alternative means of accessing the information, including via on-screen programming guides, operator websites, and subscriber notices required by Subpart T of the Commission's rules. Moreover, regulation in this area is unnecessary because cable operators have the economic incentive to ensure that the information is widely available. As explained in our reply comments, the handful of arguments in the record do not justify retaining the public file channel lineup rule.<sup>2</sup>

Respectfully submitted,

**/s/ Stephanie L. Kuhl**

Stephanie L. Kuhl

cc: Holly Saurer  
Martha Heller  
Kim Matthews  
Andrew Manley

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<sup>1</sup> See generally NCTA Comments (filed May 31, 2018).

<sup>2</sup> See NCTA Reply Comments at 1-3 (filed June 15, 2018).