

WILLKIE FARR & GALLAGHER

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December 18, 1997

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

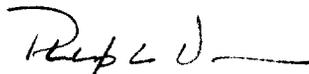
Re: Ex Parte Presentation in MM Docket
No. 92-264, Implementation of Sections
11 and 13 of the 1992 Cable Act
Horizontal and Vertical Ownership
Limits, Cross-Ownership & Anti-
Trafficking Provision)

Dear Ms. Roman Salas:

Today, David Krone, Vice President for Government Relations, Tele-Communications, Inc.; Michael Hammer, Willkie Farr & Gallagher and I met with Rick Chessen, Legal Advisor to Commissioner Gloria Tristani, to discuss the horizontal ownership limits applicable to cable television.

We urged that the Commission issue a Further Notice of Proposed Rulemaking on the horizontal issues in light of the staleness of the record on reconsideration, the changed circumstances in the forty-five months since the reconsideration pleadings were submitted, and the Commission's longstanding undertaking to review Section 76.503 in October, 1998.

Sincerely,


Philip L. Verveer

cc: Rick Chessen

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