



October 16, 2014

***Via ECFS***

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, NW  
Washington, DC 20554

**Re: Applications of AT&T Inc. and DIRECTV for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90**

Dear Ms. Dortch:

Vubiquity, Inc. (“Vubiquity”) is a global provider of multiplatform managed video services. Its services enable the transformation of content from broadcast to personalized, on demand consumption by consumers of any media on any network via any device. Among other things, Vubiquity provides a solution for new over-the-top (OTT) services and edge providers that deliver content over the internet directly to end-user internet-connected devices. AT&T is among Vubiquity’s customers.

We understand that a combined AT&T, Inc. and DIRECTV intend to make investments that will increase consumer access to high-speed broadband internet service. In particular, AT&T has committed to make enhanced fiber-to-the premises wireline broadband service available to two million additional customer locations and to deploy technology that will enable it to deliver broadband with speeds of 15 to 20 Mbps to in excess of 10 million customer locations that cannot currently access such premium services.<sup>1</sup> These investments will provide more Americans with access to high quality broadband and enable the delivery of OTT video services to millions of consumers who currently lack sufficient connectivity to obtain such services.

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<sup>1</sup> *Application of AT&T Inc. and DIRECTV for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-90, Description of Transaction, Public Interest Showing, and Related Demonstrations, at 5, 8 (June 11, 2014).*



Increasing all Americans' access to high-speed internet connectivity is an important national objective that improves the lives of Americans, spurs innovation and contributes to a robust economy. Vubiquity urges the Federal Communications Commission to give strong weight to AT&T's commitments and other related benefits of the proposed merger. We support approval of the merger.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Stephen E. Holsten".

Stephen E. Holsten  
General Counsel

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