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November 28, 2014

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: **Notice of *Ex Parte* Presentation**
Protecting and Promoting the Open Internet, GN Docket No. 14-28

Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-57

Dear Ms. Dortch:

On November 25, 2014, Stephen Kay, Senior Vice President and General Counsel of Roku, Inc. ("Roku"), Trey Hanbury and Deborah Broderson of Hogan Lovells, counsel to Roku, met with Senior Counselor Philip Verveer; Special Counsel for External Affairs Gigi Sohn; Legal Advisor Daniel Alvarez; and interns Leah Rabkin and Fanilla Cheng of the Chairman's Office; Matt DelNero, Deputy Chief of the Wireline Competition Bureau; and Eric Feigenbaum of the Office of Media Relations.

During this meeting, Roku's representatives provided background on the company's products and services and reiterated comments made in the open Internet proceeding. We discussed the need for bright-line rules as well as the importance of having timely and meaningful enforcement regardless of the source of jurisdictional authority for rules governing an open Internet.

Separately, Mr. Kay and Mr. Hanbury together with Stephen Shannon, Roku's General Manager and Senior Vice President Content and Services as well as Jonathan Kanter, counsel to Roku, met with Andrew Erber of the Office of General Counsel; Zachary Ross, Melissa Kirkel (by phone), Kristine Fargotstein, and Thomas Parisi (by phone) of the Wireline Competition Bureau; and Jeffrey Neumann and Alison Neplokh of the Media Bureau. Roku's representatives reiterated points made in comments Roku filed in earlier stages of the open Internet proceeding, including the need for bright-line rules and timely enforcement.

After Mr. Hanbury left the room, Messrs. Kay, Shannon, and Kanter discussed the proposed transfer of control of the licenses and authorizations held by Time Warner Cable Inc. ("Time Warner Cable") to Comcast Corp. ("Comcast"). Roku's representatives explained how the proposed consolidation could harm consumers who choose to use independent Internet streaming platforms. For example, the combined company may seek to abandon Time Warner Cable's plans to eliminate the need for a set-top box, degrade the service provided to Time Warner Cable customers by ending support for Time Warner Cable's Roku app, or extend Comcast's more restrictive approach towards the authentication of third party apps such as HBO Go and Showtime Anytime to the Time Warner Cable footprint. The Commission has recognized that large, vertically integrated Internet service providers ("ISPs") affiliated with multichannel video programming distributors ("MVPDs") have the incentive and ability to constrain consumer choice by favoring their own content and content delivery systems. Roku's representatives explained that, absent intervention by the Commission, the proposed transaction threatens to increase the risk of anti-consumer discriminatory practices by Comcast.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, I am filing this notice electronically in the above-referenced docket. Please contact me directly with any questions.

Respectfully submitted,

/s/ Trey Hanbury

Trey Hanbury

Partner
Counsel to Roku, Inc.