

January 30, 2015

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Applications of Comcast Corp., Time Warner Cable, Inc., Charter Communications, Inc., Time Warner Entertainment-Advance/Newhouse Partnership, and SpinCo for Consent to Assign or Transfer Control of Licenses and Authorizations*, MB Docket No. 14-57

REDACTED – FOR PUBLIC INSPECTION

DIRECTV hereby responds to the letter dated December 31, 2014 from Julie Veach, Chief of the Wireline Competition Bureau, and the Information Request for DIRECTV attached thereto (collectively, the “Request”), in the above referenced proceeding.¹ This response includes Highly Confidential Information, as well as Video Programming Confidential Information.

With respect to certain Requests, DIRECTV has searched the files within the Company reasonably believed to contain the information sought and produced responsive documents, which it has made available on the enclosed hard drive in the folder marked “Document Production A.” With respect to other Requests, DIRECTV identified responsive documents using keyword searches of DIRECTV documents submitted to the Commission in the AT&T-DIRECTV proceeding, MB Docket No. 14-90, which it has made available on the enclosed hard drive in the folder marked “Document Production B.” Pursuant to discussions with the Commission staff, DIRECTV is submitting its response consistent with the following modifications:

1. DIRECTV may limit its response to residential services in the United States only.
2. The term “TVE” shall be defined to mean the MVPD initiative, which allows consumers of certain services to access Video Programming on a variety of fixed and mobile Internet-connected devices.

¹ See Request for Information to DIRECTV Regarding Its VOD and TVE Services (attached to Letter from Julie Veach to Larry D. Hunter, Executive VP and General Counsel, DIRECTV, MB Docket No. 14-57 (Dec. 31, 2014)).

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With respect to data requests, DIRECTV has provided data that is maintained in the ordinary course of DIRECTV's business. It may contain inaccuracies that have not been corrected during the ordinary course of business. In some cases, data for specific time periods may be estimates where changes in data management systems made older data less reliable. In addition, where we have pulled data or information from different sources within DIRECTV for different requests, there may be minor discrepancies in the data. In certain cases, DIRECTV does not maintain some of the information requested in the ordinary course of business, or DIRECTV does not maintain the information in the precise manner requested. When information was not available for the period of time requested or in the form requested, DIRECTV has provided the information to the extent possible.

Where the Request seeks spreadsheets or similar graphic or tabular information, responsive information is provided in schedule folders to the response, numbered with reference to the specific Request. Where the Request seeks documents, responsive documents are produced in the folders as described above.

The Request calls for DIRECTV to submit certain information and documents that are sensitive from a commercial, competitive, or financial perspective, and that DIRECTV would not reveal in the ordinary course of business to the public or its competitors. DIRECTV is submitting designated information and documents on a Highly Confidential basis pursuant to the *Second Amended Modified Joint Protective Order* issued in this proceeding.² The inadvertent inclusion of any material that is subject to an assertion of the attorney-client, attorney work-product, or other applicable privilege is not intended as a waiver of such privilege.

Pursuant to the terms of the *Second Amended Modified Joint Protective Order*, DIRECTV submits herewith an **unredacted**, Highly Confidential version of the response, which will be made available for inspection pursuant to the terms of that order.

In addition to the narrative responses and schedules, documents responsive to the Request have been submitted in electronic form to the Media Bureau and to the Commission's contractor, consistent with the instructions in the Request and directions from the staff.

² See *Applications of Comcast Corp., Time Warner Cable, Inc., Charter Communications, Inc., Time Warner Entertainment-Advance/Newhouse Partnership, and SpinCo for Consent to Assign or Transfer Control of Licenses and Authorizations*, 29 FCC Rcd. 13799 (MB 2014) ("*Second Amended Modified Joint Protective Order*").

HARRIS, WILTSHIRE & GRANNIS LLP

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Should you have any questions or require further information, please do not hesitate to contact me.

Respectfully submitted

/s/ William M. Wiltshire

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Counsel for DIRECTV

Enclosures

cc: Vanessa Lemmé