

**DAVID R. GOODFRIEND, ESQ.
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WASHINGTON, D.C. 20036**

February 4, 2015

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 14-57

Dear Ms. Dortch:

To supplement beIN SPORT's *ex parte* filing dated January 26, 2015, the undersigned respectfully submits additional data in the attached table further illustrating the extent to which Comcast shows a more restrictive approach to authentication and "over-the-top" online sports content distribution than do other major pay-TV providers.

Sincerely,

/s/
David Goodfriend
Counsel to beIN SPORTS

Attachment

cc:

Hillary Burchuk (Team Leader)
Bill Lake (Chief, Media Bureau)
Hillary DeNigro (Media Bureau)
Jeffrey Neumann (Media Bureau)
Joel Rabinovitz (Office of General Counsel)
Jim Bird (Office of General Counsel)
Bill Freedman (Office of General Counsel)

Marcia Glauberman (Media Bureau)
Bill Dever (Wireless Competition Bureau)
Mitali Shah (Media Bureau)
Ty Bream (Media Bureau)
Julie Saulner (Media Bureau)
Allen Barna (Media Bureau)
Jake Riehm (Media Bureau)

beIN SPORTS Authenticated Content on Top MVPDs

MVPD	Authenticates beIN Sports CONNECT	Authenticates 2 linear channels: English/Spanish	Authenticates 3 overlapping live sports events	Authenticates 5 additional overflow channels	Authenticat es OTT content in HD
Comcast	No	Yes	No	No	No
Time Warner Cable	Yes	Yes	Yes	Yes	Yes
Bright House	Yes	Yes	Yes	Yes	Yes
DIRECTV	Yes	Yes	Yes	Yes	Yes
DISH Network	Yes	Yes	Yes	Yes	Yes
Cablevision	Yes	Yes	Yes	Yes	Yes
AT&T U-Verse	Yes	Yes	Yes	Yes	Yes
Verizon Fios	Yes	Yes	Yes	Yes	Yes
Cox	Yes	Yes	Yes	Yes	Yes

(see supplemental table, next page)

beIN SPORTS Authenticated Content on Top MVPDs

Programming Exhibit: Accurate through February 2nd, 2015 as compared to major Pay-TV providers listed above

PREMIUM SOCCER EVENTS (La Liga, Seria A, Ligue 1, Fifa Firendlies + Qualifiers, Champions League etc.)

- Comcast subscribers **missed 44% (519 games) of premium soccer** online content, or **779 hours** during the 10 month season spanning from August 2013 through May 2014
- Comcast subscribers **missed 49% (478 games) of premium soccer** online content, or **717 hours** during the first 6 months of the 10 month current season spanning from August 2014 through May 2015.

<i>2013-2014 Soccer Season (10 months)</i>	<i>English/Spanish Linear Channels</i>	<i>beIN CONNECT</i>	
SOCCER	AUGUST 2013 - MAY 2014	AUGUST 2013 - MAY 2014	Connect Only %
<i>La Liga (Spanish League)</i>	291	75	20%
<i>Serie A (Italian League)</i>	147	102	41%
<i>Ligue 1 (French League)</i>	69	135	66%
<i>Other Soccer Events*</i>	157	207	57%
Total	664	519	44%

*Other Soccer Events - FIFA International Friendlies + Qualifiers, Russian League, Liga Adelante (2nd Spanish League), Championship League (2nd English League), League Cup Matches

<i>2014-2015 Soccer Season (6/10 months)</i>	<i>English/Spanish Linear Channels</i>	<i>beIN CONNECT</i>	
SOCCER	AUGUST 2014 - FEBRUARY 2015	AUGUST 2014 - FEBRUARY 2015	
<i>La Liga (Spanish League)</i>	173	40	19%
<i>Serie A (Italian League)</i>	95	88	48%
<i>Ligue 1 (French League)</i>	35	129	79%
<i>Other Soccer Events*</i>	195	221	53%
Total	498	478	49%

*Other Soccer Events - FIFA International Friendlies + Qualifiers, Russian League, Liga Adelante (2nd Spanish League), Championship League (2nd English League), League Cup Matches

"PREMIUM" SPORTS (Rugby, Tennis, Boxing, Motorsports, Cycling, Basketball, Volleyball, Horse racing etc.)

- Comcast subscribers **missed 24% (18 events) of premium sports** online content, or **36 hours** during the 2013 calendar year
- Comcast subscribers **missed 76% (300 events) of premium sports** online content, or **600 hours** during the 13 months including the 2014 calendar year in addition to January of the current 2015 calendar year.

<i>2013 Calendar Year (12 months)</i>	<i>BOTH CHANNELS</i>	<i>beIN CONNECT</i>	
OTHER SPORTS*	JANUARY 2013 - DECEMBER 2013	JANUARY 2013 - DECEMBER 2013	Connect Only %
Total	58	18	24%

*Other Sports - Tennis, Boxing, Motorsports (SuperBikes, Rallycross), Cycling, Basketball, Judo, Horse Racing, Rugby, Volleyball, Swimming

<i>2014 + 2015 Calendar Year (13 months)</i>	<i>BOTH CHANNELS</i>	<i>beIN CONNECT</i>	
OTHER SPORTS*	JANUARY 2014 - FEBRUARY 2015	JANUARY 2014 - FEBRUARY 2015	Connect Only %
Total	94	300	76%