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Via Electronic Filing

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

Re: **Notice of Ex Parte Presentation**
ReelzChannel, LLC
MB Docket No. 14-57

Dear Ms. Dortch:

This is to notify you that on Wednesday, February 11, 2015, Stanley E. Hubbard, Chief Executive Officer of ReelzChannel and Vice President of Hubbard Broadcasting, Inc., along with David A. Jones, Senior Vice President, General Counsel of ReelzChannel and Vice President, General Counsel of Hubbard Broadcasting, Inc., Kevin Ryan, Vice President of Gonring, Spahn & Associates, Inc., and Charles R. Naftalin, Partner of Holland & Knight LLP (collectively, "ReelzChannel representatives"), had separate meetings with the following persons: Adonis Hoffman Chief of Staff and Senior Legal Advisor to Commissioner Mignon Clyburn; Maria Kirby, Legal Advisor to Chairman Wheeler; and the following staff of the Media Bureau, Wireline Competition Bureau, Wireless Telecommunications Bureau, Office of General Counsel, and Enforcement Bureau: Amanda Burkett, Jaimie Douglas, Elizabeth Cuttner, Keith Ingram, Adam Lazaros, John B. Adesalu, Kathy Berthot, Bill Freedman, Hillary Burchuk, Bill Dever, Ty Bream, Julie Saulnier, Marcia Glauberman, Hillary DeNigro (by telephone), Jim Bird, Joel Rabinovitz, Will Reed, and Allen Barna.

During these meetings, Mr. Hubbard of ReelzChannel described some of the long history of innovation and success of ReelzChannel, and its parent entity Hubbard Broadcasting, in broadcasting and video programming. Such history includes the development of ReelzChannel (with its tagline: *Hollywood Happens Here*), which began in 2001, to the launch of the network in 2007, its substantial commitment to original programming and its status to date. ReelzChannel representatives described its long, positive and productive relationships with both Comcast and Time Warner Cable from its earliest times of planning in 2001 to the present.

Along with DIRECTV and Dish Network, Comcast and Time Warner Cable were among the first distributors to agree to carry ReelzChannel, entering into carriage arrangements with ReelzChannel years before the launch of the network. In its many years of experience, ReelzChannel found that Comcast and Time Warner Cable were supportive of its efforts to become a successful independent programming network. For example, Comcast provided a clear path for ReelzChannel to follow to secure carriage on its systems and to grow distribution over time. That clear path has not changed over the years and always included an expectation that the network would make meaningful investments in original programming. In that regard, ReelzChannel provided certain of its own financial information to the FCC's staff of a proprietary nature that it keeps confidential. ReelzChannel generally described aspects of its carriage arrangements, such as its distributors, growth over time, timing of its launch, term lengths, and a broad schedule of required renewals of carriage agreements that are expected in the coming months.

Throughout its many years of business dealings, ReelzChannel has found Comcast to be clear, fair and true to its commitments, including, to the best of its knowledge, all of the programming commitments that Comcast made under the NBCU merger. Mr. Hubbard noted that he believes that the entrepreneurial spirit of the Roberts family lives-on in Comcast, noting the family's small business and independent roots that branched out from a small cable television business years ago, and through smart investments, grew into the Comcast of today. While over the course of time the media industry has experienced substantial consolidation, ReelzChannel believes that the philosophy of the Roberts family, which supports opportunities for small, independent business and a diversity of voices, remains an important part of the Comcast culture. At no time has Comcast or Time Warner Cable attempted to remove ReelzChannel from carriage, in fact, both of them have expanded and improved distribution of ReelzChannel consistently since its 2007 launch as recognition of its progress and continuing investment in original programming. ReelzChannel believes that smart and substantial infrastructure investments by Comcast, which have developed the highest capacity distribution system in the wired media industry, is what allows Comcast to offer improved opportunities for carriage of independent networks--such as ReelzChannel--a network that has earned distribution based upon its long-term investments, efforts and success, especially for delivery of original programming.

As an independent network, ReelzChannel has developed and offered a substantial and growing amount of original programming in order to differentiate itself in the marketplace. As an example of the importance of maintaining strong independent voices, more established corporately owned networks would not broadcast *The Kennedys* miniseries, but ReelzChannel did, and it garnered ten Emmy nominations, winning four Emmys, along with a Directors Guild award. ReelzChannel now is in the process of developing a sequel to *The Kennedys*, which will premiere next year, bringing Katie Holmes back to continue the role of Jackie Kennedy Onassis. Among the innovative original programming that ReelzChannel provides, Mr. Hubbard also called attention to *Beverly Hills Pawn* and *Autopsy*, as successful series. Without the support of Comcast and Time Warner Cable, ReelzChannel would not have launched its network in 2007 and would not be fully available today in 70 million homes across the US.

ReelzChannel embraces its independence and believes that independent businesses are engines for diversity and change in every industry. It supports independence in all business, for example, through its own public service initiative on-air and at its website: www.independencehappenshere.com. ReelzChannel has been nominated for a Cynopsis Social Good Award due to its support of independent business nationwide.

Consistent with its August 25, 2014 comments in support of the merger of Comcast and Time Warner Cable, filed in MB Docket No. 14-57, ReelzChannel believes that it would serve the public interest to approve the merger of Comcast and Time Warner Cable, which would cause no material harm to the marketplace, and because Comcast and Time Warner Cable have lived up to their commitments in the past. In addition, ReelzChannel submits that a prompt approval would reduce business uncertainty, which would support the continued growth of the diverse voices offered by independent networks. For similar reasons, ReelzChannel also supports a prompt approval of the merger of AT&T and DIRECTV.

Pursuant to Section 1.1206 of the Commission rules, we are filing this letter with your office electronically and are electronically providing a copy of this submission to the meeting attendees listed below. In the event that there are any questions concerning this matter, please communicate with me.

Respectfully submitted,

/s/ Charles R. Naftalin
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