



April 3, 2015

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

Re: Notice of Ex Parte Communication, MB Docket No. 15-53

Dear Ms. Dortch:

On Wednesday, April 1, 2015, Rick Kaplan, Erin Dozier and the undersigned of the National Association of Broadcasters, as well as Stephen Kinnaird of Paul Hastings LLP, met with Jonathan Sallet, Susan Aaron, Marilyn Sonn, Jennifer Tatel, Suzanne Tetreault of the Office of General Counsel as well as Bill Lake, Steven Broeckaert and Diana Sokolow of the Media Bureau, to discuss the Commission's implementation of Section 111 of the STELA Reauthorization of 2014 (STELAR).<sup>1</sup>

In the meeting, we discussed the potential ramifications of reversing the current presumption that cable systems do not face "effective competition" in all markets. We stated that the Commission's proposal to adopt a new rebuttable presumption of effective competition for all cable operators, including large cable operators, could raise significant issues for broadcasters and consumers and goes beyond STELAR's limited

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<sup>1</sup> *Amendment to the Commission's Rules Concerning Effective Competition; Implementation of Section 111 of the STELA Reauthorization Act*, Notice of Proposed Rulemaking, MB Docket No. 15-53, FCC No. 15-30 (Mar. 16, 2015)(*NPRM*).

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directive to modify the petition filing process for small cable companies.

Respectfully submitted,

A handwritten signature in black ink that reads "Scott Goodwin". The signature is written in a cursive, flowing style with a prominent dot above the 'i'.

Scott Goodwin  
Associate General Counsel  
Legal and Regulatory Affairs

cc: Jonathan Sallet  
Susan Aaron  
Marilyn Sonn  
Jennifer Tatel  
Suzanne Tetreault  
Bill Lake  
Steven Broeckaert  
Diana Sokolow