



April 7, 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 Monday, April 6, 2015, Rick Kaplan, Erin Dozier and the undersigned of the National Association of Broadcasters, participated in a meeting by phone with Marilyn Sonn and Susan Aaron of the Office of General Counsel as well as Bill Lake, Diana Sokolow, Michelle Carey, Holly Saurer and Steven Broecker of the Media Bureau, to discuss the Commission's implementation of Section 111 of the STELA Reauthorization of 2014 (STELAR).¹

In the meeting, we discussed some of the potential ramifications should the FCC reverse its current presumption that cable systems do not face "effective competition" in every market across the country. We made clear in particular that a finding of effective competition does not alleviate a cable operator's duty to provide a basic tier for consumers that includes all local commercial and noncommercial television stations. The 1992 Cable Act was designed, in part, to protect consumers and thus sought to ensure that cable operators had to offer a basic tier package that includes these stations so as not to unreasonably require consumers to pay for other, higher-priced tiers of service to access local information.

¹ *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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Respectfully submitted,

A handwritten signature in black ink that reads "Scott Goodwin". The signature is written in a cursive, fluid style with a prominent dot on the final letter.

Scott Goodwin
Associate General Counsel
Legal and Regulatory Affairs

cc: Marilyn Sonn
Susan Aaron
Diana Sokolow
Bill Lake
Steven Broeckaert
Michelle Carey
Holly Saurer