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Jennifer A. Johnson

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5552
jjohnson@cov.com

May 27, 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 Tuesday, May 26, 2015, Jennifer Johnson and Gerry Waldron of Covington & Burling LLP, representing the NBC Television Affiliates and the CBS Television Network Affiliates Association (collectively, the "Affiliates"), met with Valery Galasso, Policy Advisor to Commissioner Rosenworcel, to discuss the Commission's implementation of Section 11 of the STELA Reauthorization Act of 2014 (STELAR). The Affiliates' representatives discussed the consumer harm and disruption that could result from reversing the current presumption that cable systems do not face "effective competition" in all markets. Specifically, the Affiliates representatives explained that reversing this presumption would lead to increased cable rates across the country. In addition, such a change would intensify cable operators' efforts to move broadcast stations off of the basic tier – a move that would create legal controversy, increase retransmission consent disputes, cause viewer disenfranchisement, and push subscribers to purchase higher cost tiers of service. All of these results are contrary to the public interest. The Affiliates representatives also pointed out that reversing the presumption would be contrary to the plain language of the Communications Act, contrary to the narrow mandate in STELAR, and contrary to the intent of STELAR, as evidenced by the letter recently sent by 13 Senators urging the FCC not to take this sweeping action.

Please direct any questions with respect to the foregoing to the undersigned.

Sincerely,

/s/
Jennifer Johnson

cc: Valery Galasso