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June 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 Tuesday, June 2, 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 Chanelle Hardy, Chief of Staff and Media Legal Advisor to Commissioner Clyburn, to discuss the Commission's implementation of Section 111 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. The Affiliates representatives further explained that major MVPDs have made it clear to broadcasters in recent years that these MVPDs have plans to move broadcasters to the expanded basic tier as soon as permitted by FCC and applicable law.

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

Sincerely,

/s/
Jennifer Johnson

cc: Chanelle Hardy