

**Kimberly A. Hulsey**  
Vice President, Legal and Government Affairs

Marlene H. Dortch, Esq.  
Secretary  
Federal Communications Commission  
443 12th St., S.W.  
Washington, D.C. 20554  
*Via Electronic Comment Filing System*

*Re: MB Docket 14-261, In the Matter of Promoting Competition and Innovation in the Provision of Multichannel Video Distribution Services*

Dear Ms. Dortch:

On June 30, 2015, I, the undersigned, Kimberly Hulsey, Vice President, Legal and Governmental Affairs, Scripps Networks Interactive Inc.; Kyle Dixon, Vice President, Public Policy, Time Warner Inc.; Susan L. Fox, Vice President, Government Relations, and Austin Gaddis, Legal Intern, both of The Walt Disney Company; Anne Lucey, Senior Vice President, Government Relations, CBS Corporation; Keith R. Murphy, Senior Vice President, Government Relations and Regulatory Counsel, Viacom Inc.; and Jared S. Sher, Vice President and Associate General Counsel, 21st Century Fox, Inc. met with the following officials of the Media Bureau of the Commission: Bill Lake, Nancy Murphy, Mary Beth Murphy, Steven Broeckaert, Raphael Sznajder, Michelle Carey, Susan Singer, Ryan Brunner, Jaclyn Haughom, Brittani Zacco, Julie Shursky, Brendan Murray, Tom Hastings, Kathy Berthot, and Allison Neplokh. All of the companies represented offer programming for exhibition to consumers of multichannel video programming distribution (“MVPD”) services. Separately, on June 30, 2015, we met with Chanelle Hardy, Chief of Staff and Media Adviser to Commissioner Mignon Clyburn and, on July 1, 2015, we met with Commissioner Jessica Rosenworcel and her Policy Advisor, Valery Galasso. The undersigned did not attend the July 1<sup>st</sup> meeting. In all three meetings, we discussed the impact of the rule changes for which the Commission sought comment in its Notice of Proposed Rule Making (“NPRM”) in MB Docket 14-261 on programmers and, most importantly, on consumers.

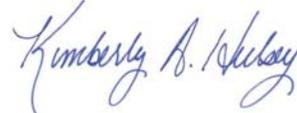
We explained that programmers have significant incentives to make our content available on as many platforms as possible and in ways that provide access to the high-quality content that consumers demand. We pointed out that programmers support the growth of distribution opportunities and questioned the need for these proposed rule changes at this time. We expressed two specific concerns about proposals raised in the NPRM.

First, the NPRM asked whether programmers would be affected if the Commission took steps to influence the acquisition of programming rights for on-line distribution. We explained that such a requirement would be a troubling and unnecessary interference into private licensing negotiations. We explained that this is an area that is best separately addressed under copyright law, which gives creators appropriate flexibility to negotiate over the exclusive rights conferred to them.

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Second, we expressed concern about whether any new definition of MVPD would apply to programmers' distribution of content through their own applications, services or sites that programmers may use to exhibit their content to consumers. We urged that new rules seeking to promote innovation and competition in video distribution should not apply to content providers who simply want to continue developing new ways in which consumers can access and enjoy their content.

Respectfully submitted,



Kimberly Hulsey  
Vice President, Legal and Government  
Affairs  
Scripps Networks Interactive