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July 13, 2015

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**Via ECFS**

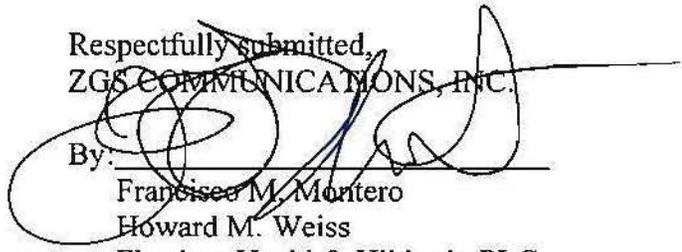
Marlene H. Dortch, Secretary  
 Federal Communications Commission  
 445 12th Street, S.W.  
 Washington, D.C. 20554

**Re: *Ex Parte* Letter: AT&T and DirecTV Merger Proceeding,  
 MB Docket No. 14-90**

Dear Ms. Dortch:

On July 8, 2015, Ronald Gordon, Chief Executive Officer of ZGS Communications, Inc. ("ZGS"), Cynthia Martinez, also a management-level official of ZGS, and Francisco Montero and Howard Weiss of the law firm of Fletcher, Heald & Hildreth, PLC, met with Valery Galasso, Policy Advisor to Commissioner Jessica Rosenworcel. During this meeting, ZGS and the Commission parties discussed the refusal of DirecTV to carry ZGS' Spanish-language, local programming.

Respectfully submitted,  
 ZGS COMMUNICATIONS, INC.

By:   
 Francisco M. Montero  
 Howard M. Weiss  
 Fletcher, Heald & Hildreth, PLC  
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 Arlington, Virginia 22209

Counsel for ZGS Communications, Inc.

Enclosure

cc: Ms. Valery Galasso, Policy Advisor, Office of Commissioner Jessica Rosenworcel (w/encl.)



**AT&T and DIRECTV  
Local Carriage Commitment  
“The Right Thing to Do”**

**July 8, 2015**

# ZGS AT-A-GLANCE

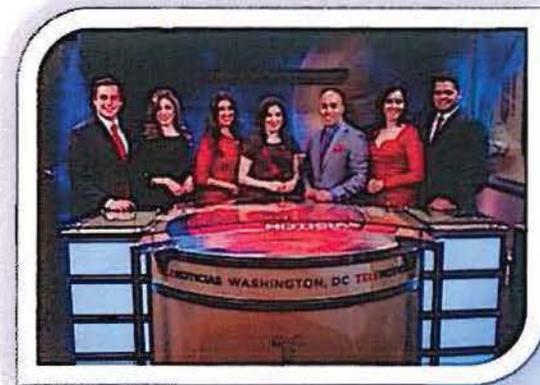
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- Strong and successful Spanish-language TV operator for 30 years with a solid reputation for excellence
  - Strong operations, dedicated teams
  - Continuous investment in local content and stations
- Dedicated to localism
  - Quality local news in top markets
  - More local programming than any other Spanish broadcaster
  - Extensive community service – our mission and responsibility
  - Strong civic engagement
- 25-year affiliate partnership with Telemundo
- Only Hispanic-owned TV broadcast group in the U.S.
  - 180+ employees, 94% are female and/or minority
  - Strong commitment to diversity and developing media professionals

# SERVING OUR LOCAL COMMUNITIES

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- Local early and late news in Top 20 markets
  - Highest journalistic standards to inform and educate the Hispanic community
  - Public safety and emergency notices
  - Up-to-the-minute weather reports
  - Award-winning local newscasts
- Culturally relevant and community affairs programming
  - Agenda
  - **holaciudad teve!**
  - Línea Directa
  - Telediario
  - Telenoticias Xtra
  - Two Zona
  - ...and much more!



***"La Voz de la Comunidad" – The Voice of our Community***

# SERVING OUR LOCAL COMMUNITIES

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- Civic engagement and public service initiatives
  - *Vota por tu Futuro* – registration and GOTV
  - Affordable Care Act Town Halls
  - Línea de Ayuda – Help Line
  - Buena Vida Health Expo
  - Education
    - Hispanic Heritage Scholarship Award
    - *Educación a su alcance*
- Celebration of Hispanic heritage and culture
  - La Feria de la Familia
  - Fiesta de las Madres
  - Hispanic Heritage Festivals
  - ... and much more!

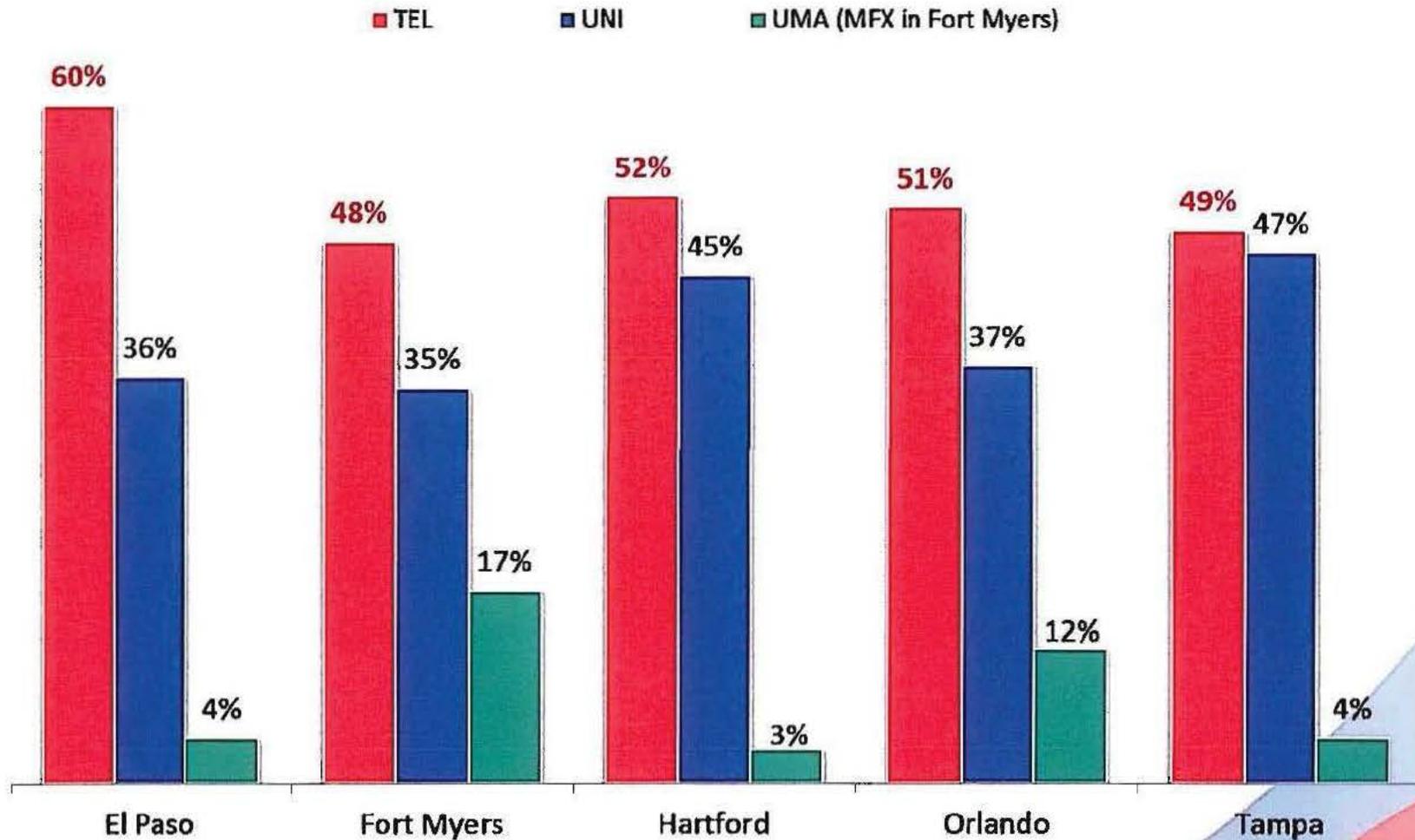


# ZGS STATION GROUP RATINGS HIGHLIGHTS

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- ZGS stations are local news leaders
- WTMO is the #1 Spanish-language station in Orlando sign-on to sign-off and primetime among major demos
- WRMD leads all Spanish language stations in Tampa in primetime, and has the #1 Spanish-language newscast at 6pm and 11pm
- KTDO is El Paso's #1 station in primetime, regardless of language
- WWDT is the #2 broadcast station in Fort Myers in primetime, regardless of language
- WRDM is the Spanish-language leader in Hartford in primetime among key demos

# ZGS STATIONS LEAD PRIMETIME VIEWING IN KEY MARKETS

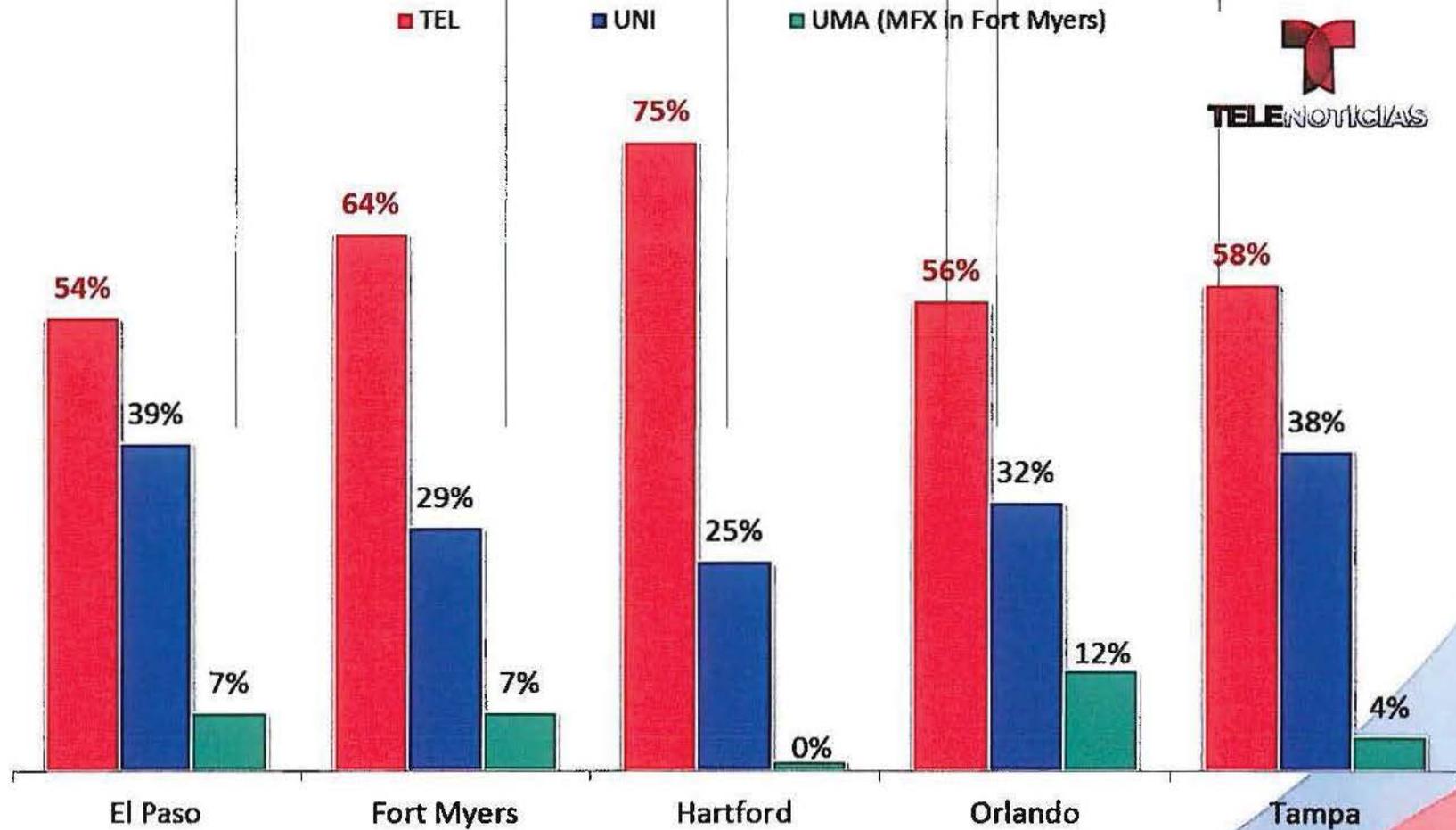


Source: Nielsen NSI 7 M-F 6-10pm (El Paso) and M-F 7-11pm: May Sweeps 2015. Based on A25-54.

Spanish share calculation includes each market's local Telemundo, Univision, and UniMas station, except for Fort Myers which does not include UniMas, but MundoFox.

**ZGS** Communications

# ZGS LOCAL NEWS IS THE PREFERRED SPANISH-LANGUAGE NEWSCAST IN SEVERAL MARKETS



Source: Nielsen NSI M-F 10-10:30pm (El Paso) and M-F 11-11:30pm. May sweeps 2015. Based on A25-54, except for El Paso which is based on A18-34.

Spanish share calculation includes each market's local Telemundo, Univision, and UniMas station, except for Fort Myers which does not include UniMas, but MundoFox.

**ZGS** Communications

# DIRECTV'S FAILURE TO SERVE

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- Systematic refusal to fully serve the Hispanic community
  - Over 12 years of effort to secure carriage
  - Multiple reasonable proposals – no fees, marketing support
  - Sizeable communities denied service
- Only Hispanic community denied local service
  - Only television station with local news NOT carried in market
  - Carry network signal in SD rather than local station in HD
- Marketing efforts misrepresent local station carriage
- Almost all other MVPDs carry ZGS stations

***Class A – A poor excuse to deny the Hispanic community local service***

# DIRECTV SHOULD DO THE RIGHT THING

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- DirecTV should commit to fully serving Hispanic communities
- Commit to fairly evaluate local carriage options
  - Consider:
    - Size of Hispanic population in market
    - Stations that produce local news and programming
    - Number of locally active Spanish stations
    - Relative audience shares
- All top local stations should be in DirecTV lineup
- FCC should demand that DirecTV stop denying Hispanic consumers local service