

July 27, 2015

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
455 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation; MB Docket No. 14-261

Dear Ms. Dortch:

On July 23, 2015, on behalf of AMC Networks Inc., Bob Broussard, President of Distribution and Aileen Brophy, Senior Vice President of Legal and Business Affairs, together with Tara Corvo and Radhika Bhat of Mintz Levin, met with Michelle Carey, Steven Broecker, Brendan Murray, Susan Singer, Raphael Sznajder, Kathy Berthot, and Mitali Shah of the Media Bureau; Alison Neplokh of the Office of Strategic Planning; and Lyle Elder of the Enforcement Bureau to discuss the above-captioned matter.

We discussed how programmers today negotiate for and acquire different types of distribution rights. New media rights are frequently acquired separately from television distribution rights, for an additional fee, and are not always available or available at a reasonable price. It is critical that programmers be allowed to retain the business judgment regarding when acquisition of such rights makes sense for particular programming within the context of the programming budget. Programmers also need to be able to protect the value of their brand by ensuring that they distribute only through bona fide distributors that offer subscribers a robust high-quality offering containing a number of programming services.

Requiring programmers to purchase online distribution rights in all cases may lead to increased programming costs, especially due to the increased leverage content holders will have in negotiations with affected programmers. Being forced to assume such costs – or forego valuable programming if the required rights cannot be acquired at a reasonable cost – would place affected programmers at a competitive disadvantage, exacerbating the already unequal playing field between affiliated and unaffiliated programmers.

Moreover, such a requirement would do very little to advance the Commission's stated goal of ensuring that nascent, Internet-based video programming services have access to the programming they need to grow. Only a select few programming services would be affected by the change in rule, and the market for innovative new distribution services is already developing rapidly, without any need for governmentally enforced access to programming.

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

BOSTON | LONDON | LOS ANGELES | NEW YORK | SAN DIEGO | SAN FRANCISCO | STAMFORD | WASHINGTON

Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C.

Ms. Marlene H. Dortch

July 27, 2015

Page 2

Pursuant to section 1.1206(b) of the Commission's rules, an electronic copy of this letter is being filed electronically with the Office of the Secretary and served electronically on the Commission participants in the meeting.

Should there be any questions regarding these matters, please contact the undersigned.

Sincerely,

/s/ Tara M. Corvo
Tara M. Corvo

cc: Michelle Carey
Steven Broeckaert
Brendan Murray
Susan Singer
Raphael Sznajder
Kathy Berthot
Mitali Shah
Alison Neplokh
Lyle Elder