

August 26, 2015

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

**Re: *Amendment to the Commission's Rules Related to Retransmission Consent,*
MB Docket No. 10-71**

Dear Ms. Dortch:

On August 25, 2015, Mediacom Communications Corporation sent copies of the attached letter to Gigi B. Sohn, Counselor to Chairman Wheeler, and to William T. Lake, Bureau Chief, Media Bureau, via email.

Respectfully Submitted

/s/ Ari Z. Moskowitz
Ari Z. Moskowitz
*Counsel for Mediacom Communications
Corporation*

Attachment



Thomas J. Larsen
Senior Vice President
Government & Public Relations

August 25, 2015

By Email (rkaplan@nab.org)

Rick Kaplan
Executive Vice President and General Counsel
Legal and Regulatory Affairs
National Association of Broadcasters
1771 N Street NW
Washington, DC 20036

Re: NAB's August 24, 2015 Notice of Ex Parte Communication, MB Docket No. 10-71

Dear Mr. Kaplan:

I noted with interest your statement in your ex parte notice that Mediacom's petition for rulemaking filed with the Federal Communications Commission on July 7, 2015 (RM-11752) has been "widely ridiculed."

Mediacom rarely files petitions for rulemaking, and when we do, it is with the sincere belief that the issue is important for consumers, that our proposal is in the public interest and, based on the advice of our outside legal counsel, that the rules requested are within the scope of the Commission's authority. We were, therefore, surprised by your characterization of our July 7th petition.

The only publicly filed opposition we could find to our petition came from your organization and five broadcast station owners collectively responsible for over 170 blackouts impacting millions of American consumers.¹ Making your "widely ridiculed" characterization even more puzzling was the fact that another broadcast station owner, Block Communications, Inc., stated that Mediacom's "petition is just the latest in a long series of marketplace signals to the FCC that the retransmission consent system is badly broken and in need of reform."²

¹ The five broadcast station owners filing in opposition to Mediacom's petition were Nexstar Broadcasting Group, Gray Television Group, Media General, Meredith Corp., and Raycom Media. If you look at the retransmission consent negotiating history of these five companies (including Media General's predecessor companies, LIN Media and Young Broadcasting), they are collectively responsible for well over 170 station blackouts impacting millions of consumers served by a wide variety of MVPDs including Bright House Networks, Buckeye CableSystem, Cablevision, Cable One, Cox, DirecTV, Dish Network, Margaretville Telephone, Mediacom, Suddenlink and Time Warner Cable.

² Comments of Block Communications, Inc., Petition for Rulemaking to Amend the Commission's Rules to Promote Expanded Free Access to Local Broadcast Television Stations Via Over-the-Air Reception, Internet Streaming, Or Other Means, RM-11752 (filed Aug. 14, 2015) at 1.

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While there was not even unanimous opposition to our petition within the broadcast television industry, we do want to afford you the opportunity substantiate your assertions. To that end, we would be interested in seeing support for your claim in the form of a list of citations to sources where our petition has been ridiculed by commentators outside of a handful of broadcast industry representatives. You can send me the list at tlarsen@mediacomcc.com.

We are sending a copy of this letter to Bill Lake and Gigi Sohn at the Commission, and would appreciate it if you would deliver a copy of the source list to them, as well.

Thank you for your cooperation.

Sincerely,



Tom Larsen

cc: Bill Lake, FCC Media Bureau Chief
Gigi Sohn, Counselor to the FCC Chairman