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EX PARTE

December 4, 2015

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

Re: Expansion of Online Public File Obligations to Cable and Satellite TV Operators and Broadcast and Satellite Radio Licensees; MB Docket No. 14-127

Dear Ms. Dortch:

On December 2, 2014, Diane Burstein, Vice President and Deputy General Counsel, and I, of the National Cable & Telecommunications Association, met with Kim Matthews, Mary Beth Murphy, and Holly Saurer of the Media Bureau to discuss NCTA's written comments in the above-referenced proceeding.

Consistent with our comments, we explained that, given the large number of cable systems and the numerous documents that must be retained in local public files, the Commission should minimize the burdens of any online public filing requirement.¹ In particular, the database should be designed so that a single upload can populate multiple files.² In addition, any new system should enable cable operators to link to existing company electronic databases, such as those currently used by some operators to manage their political files.³ We also emphasized that any new rules should provide an appropriate transition period to avoid unduly taxing company resources.⁴

¹ See NCTA Comments (filed Mar. 16, 2015) at 3-9; NCTA Reply Comments (filed Apr. 14, 2015) at 4-5.

² See NCTA Comments at 4-6.

³ See *id.* We also noted that the Commission should eliminate duplicative records regarding compliance with the commercial limits in children's programs, and instead should permit operators to provide documentation regarding compliance only in the event of a complaint. See *id.* at 7.

⁴ See *id.* at 11-13. Especially given the upcoming political campaign season, we urged the Commission to provide cable operators with sufficient time to become familiar with any new requirements and to develop plans for compliance. See *id.* at 12 (explaining that cable operators "will need to configure their compliance efforts to be compatible with the database, both with respect to training personnel, and to implement any necessary technological solutions and/or interfaces").

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Finally, we explained that the Commission should exempt certain smaller cable systems from the online file requirement.⁵

Respectfully submitted,

/s/ Stephanie L. Podey

Stephanie L. Podey

cc: Kim Matthews
Mary Beth Murphy
Holly Saurer

⁵ *See id.* at 13, 14-15; NCTA Reply Comments at 5. We urged the Commission to reject a proposal to move certain small systems from an “upon request” regime for providing documents to a requirement to upload all public file documents to the Commission’s online public file database. *See* NCTA Comments at 15.