



May 5, 2016

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

Re: Notice of Ex Parte Communication, MB Docket Nos. 15-216, 10-71, 14-50 and 09-182

Dear Ms. Dortch:

On Tuesday, May 3, 2016, the undersigned met with Jessica Almond of the Office of Chairman Wheeler, to discuss the current retransmission proceeding and the Commission's broadcast ownership rules.

During our conversation, I discussed issues consistent with the National Association of Broadcaster's comments and reply comments in the current retransmission consent proceeding. I specifically emphasized the pro-competitive effects of bundling, including the efficient economies of scale and other cost savings that can be passed through to consumers, as well as the important role bundling plays in fostering the development of new, diverse programming. I also noted that multichannel video programming distributors (MVPDs) are the true masters of the bundle. MVPDs routinely bundle not only programming networks but also their service packages, grouping television, Internet, home phone and even wireless services into double-, triple-, and quadruple-play bundles, sometimes giving consumers little or no choice to select just one service if they prefer. It therefore should tickle the Commission that MVPDs – in this one instance – are asking for the government to intervene to severely curtail or eliminate completely the ability of broadcasters to offer programming bundles.

Ms. Almond and I also discussed the Commission's media cross ownership rules. I noted that the Commission adopted the cross ownership rules at a time – now more than 40 years ago – when the media landscape was dramatically different, and how in today's intensely diversified media marketplace, no one can rationally argue that they serve any meaningful

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purpose. Instead, the rules serve to further burden the already heavily regulated broadcast industry. Newspapers and broadcasters face tremendous competition for investment, and the media cross ownership rules unnecessarily restrict much-needed capital that would otherwise be available to encourage the survival of local news sources. The rules have been and continue to be a disservice to the American public.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rick Kaplan", with a long horizontal line extending to the right.

Rick Kaplan  
General Counsel and Executive Vice President  
Legal and Regulatory Affairs  
National Association of Broadcasters

Cc: Jessica Almond

