



CBS Government Affairs

801 Pennsylvania Avenue, N.W.
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June 8, 2016

By ECFS

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

**Re: Notice of Ex Parte Communication
MB Docket No. 15-216
Implementation of Section 103 of the STELA Reauthorization
Act of 2014 -- Totality of the Circumstances Test**

Dear Ms. Dortch:

On June 7, 2016, Susan Fox of The Walt Disney Company, Jared Sher of 21st Century Fox, Inc., and the undersigned (Broadcaster Representatives) met with Commissioner O'Rielly and his advisor Robin Colwell.

We emphasized that no changes in the good faith negotiation rules are warranted in light of the absence of evidence either of market failure in the programming marketplace or of the inefficacy of the current rules. We also expressed concern that any modification of the existing regulatory regime be consistent with the Congressional directive embodied in Section 325 and with competition policy and the Commission's own precedent, and that it be based on empirical evidence rather than anecdote, contrived assumptions and overheated rhetoric.

This letter is being submitted electronically pursuant to Section 1.1206(b) of the Commission's Rules. Please contact the undersigned if you have any questions about this submission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Shrey", written over a light gray rectangular background.

cc:
Commissioner O'Rielly
Robin Colwell