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June 15, 2016

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

RE: GN Docket No. 12-268; MB Docket No. 15-137; MB Docket No. 03-185

Dear Ms. Dortch:

On June 13, 2016, Rick Chessen (NCTA's Senior Vice President, Law & Regulatory Policy), Michael Schooler (NCTA's Vice President and Deputy General Counsel) and I met with William Lake, Michelle Carey, Kim Matthews, and Shaun Maher, of the FCC's Media Bureau, and David Konczal and Bill Scher, of the FCC's Office of the General Counsel, to discuss NCTA's written comments in the above-captioned proceedings regarding post-auction channel sharing by full power and low power television stations.

In particular, we noted that the must carry provisions of the Cable Act require cable operators to carry only a single "primary video" stream for each 6 MHz channel. While the Spectrum Act granted unique must carry rights in connection with channel sharing by certain stations that voluntarily relinquished their spectrum for auction, granting the same rights to sharee stations post-auction would not serve the same governmental interest. Instead, unlike auction-related channel-sharing that results in spectrum being returned to the government for auction, post-auction channel sharing could open up vacated channels for new television stations. We explained that allowing both the "sharee" station and any new television station to assert the right to mandatory carriage in such circumstances would unlawfully increase the burdens and unreimbursed costs of must carry on cable operators, as well as raise significant First Amendment problems.

We further proposed that the Commission gain practical experience with auction-related channel sharing before it moved ahead with any proposal to permit post-auction channel sharing.

Respectfully submitted
/s/ **Diane B. Burstein**
Diane B. Burstein

cc: William Lake
Michelle Carey
Kim Matthews
Shaun Maher
David Konczal
Bill Scher