

June 15, 2016

VIA ELECTRONIC FILING

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

**Re: Notice of *Ex Parte* Presentation  
*In the Matter of Expanding Consumers' Video Navigation Choices, MB Docket No. 16-42; Commercial Availability of Navigation Devices, CS Docket No. 97-80***

Dear Ms. Dortch:

On June 13, 2016, representatives of Time Warner Inc. met with Commissioner Jessica Rosenworcel, Legal Advisor Marc Paul and Special Advisor Jennifer Thompson in connection with the proceeding referenced above. Time Warner was represented by Paul T. Cappuccio, Executive Vice President and General Counsel, Carol A. Melton, Executive Vice President, Global Public Policy, and the undersigned.

The purpose of this meeting was to discuss Time Warner's concerns regarding the Commission's proposed rules.

Time Warner noted that it strongly supports providing consumers with more choice and has been a leader in making its content widely available on an expanding array of devices and platforms. The company noted that it has entered into agreements with manufacturers of a growing number of devices that can be connected to a traditional MVPD video service. In addition, Time Warner, like other content companies, licenses its networks to an increasing number of broadband-delivered services, which can offer consumers more choice among bundles, more on-demand programming, and better user interfaces. The company noted that this record of innovation clearly demonstrates that it is feasible to increase competition and consumer choice through a regulatory regime based on content companies having a direct licensing relationship with device manufacturers, traditional distributors, and online platforms. Time Warner also noted that, unlike the proposed rules, such a regime would not only respect contracts and copyright law, but also provide an effective way to protect consumers' viewing experience, to provide incentives to create and distribute programming that consumers enjoy, and to avoid free-riding by third parties.

Time Warner is therefore strongly opposed to the proposed rules. The company said that it would continue to assist the Commission as it examines ways to address the concerns raised as the proceeding moves forward.

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Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed via ECFS, and a copy will be provided via email to the individuals listed below. Please contact me if you have any questions regarding this notice.

Respectfully submitted,

  
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Kyle D. Dixon

cc: Commissioner Rosenworcel  
Marc Paul  
Jennifer Thompson