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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Michael H. Hammer

November 22, 2000

EX PARTE

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals - 445 12th Street, S.W.
TW-A325
Washington, DC 20554

Re: Implementation of Video Description of Video Programming,
MM Docket No. 99-339

Dear Ms. Salas:

On November 21, 2000, Becky Powhatan and Ray Ban of The Weather Channel, and the undersigned met with David Goodfriend of Commissioner Ness's office regarding the above-captioned matter. We discussed our view that "crawls" and "scrolls" should be treated the same under paragraph 51 of the Commission's order. We also expressed the view that programmers should be afforded flexibility to make good faith judgments about what constitutes emergency information under the rules. Finally, we discussed the application of the aural tone requirement to certain equipment used by The Weather Channel.

We left copies of the attached documents with Mr. Goodfriend.

An original and two copies of this letter are submitted herewith in accordance with Section 1.1206(b) of the Commission's rules.

Thank you.

Respectfully submitted,

Michael H. Hammer

Michael H. Hammer
ES:R/SDB

CH2

cc: D. Goodfriend, Esq.

Atts.

Washington, DC
New York
Paris
London

Star Unit Analysis

Type	Units	TWC Subs	Avg. Subs/ Star	% of Total Subs
Star XL	1,288	46,516,390	36,115	64.32%
Star 4000	2,187	9,157,018	4,187	12.66%
Star Jr.	3,894	1,820,802	468	2.52%
Star III	1,783	2,919,192	1,637	4.04%
Starless	4,542	1,221,305	269	1.69%
DBS		10,682,602		14.77%

Cost of Star XL: \$ 6,500

Cost of replacing Star III with Star XL: 1,783 units x \$6,500 = \$ 11,589,500

Cost of replacing Star Jrs. with Star XLs: 3,894 units x \$6,600 = \$ 25,311,000

Cost of adding beep to Star Jr.: 3,894 units x \$250 = \$ 973,500

**THE WEATHER CHANNEL
WEATHER WARNINGS AND ADVISORIES**

**NUMBER ISSUED VIA THE WEATHER STAR
DURING ONE YEAR PERIOD:**

WARNINGS

37,903

SEVERE WEATHER STATEMENTS

22,530

SPECIAL WEATHER STATEMENTS

79,644

WINTER ADVISORIES

9,460

TOTAL WARNINGS AND ADVISORIES ISSUED:

149,537