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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

May 22, 2002

REDACTED - FOR PUBLIC INSPECTION

Marlene H. Dortch
Secretary
Federal Communications Commission
Office of the Secretary
444 12th Street S.W.
Washington, D.C. 20554

Re: *Consolidated Application of EchoStar Communications Corporation, Hughes Electronics Corporation, and General Motors Corporation for Authority to Transfer Control (CS Docket No. 01-348)*

Dear Ms. Dortch:

On April 24, 2002, representatives from DIRECTV, Inc. ("DIRECTV") participated in a telephone conference (the "Call") with representatives from the Commission, including Marcia Glauberman, C. Anthony Bush, David Sappington, Alex Belinfante, and Tracy Waldon. Applicants filed an *ex parte* notice the day after the Call.

During the Call, DIRECTV agreed to supplement the record in response to several questions raised by Commission representatives. This letter supplementing the record is designated as public under the Protective Order adopted by the Cable Services Bureau on January 7, 2002. Pursuant to that Order, DIRECTV is concurrently filing a non-redacted confidential version of this letter.

NFL Promotion

[Redacted]

SMART Market Simulator

During the Call, DIRECTV agreed to provide additional information about a simulation program produced by an outside vendor named Strategic Marketing and Research Techniques, and known as SMART.

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[Redacted]

DIRECTV is ready and able to provide a company expert who can answer any additional questions on this issue that the Commission may have via conference call or at an in person meeting.

Equipment Tracking

During the Call, DIRECTV agreed to find out whether DIRECTV could track from which distribution channel, i.e., retailer, individual customers purchase their equipment. The answer is yes. By matching information provided to DIRECTV by the equipment manufacturers with information DIRECTV gathers from new customers during the activation process, DIRECTV has the ability to determine from which channel individual customers have acquired their equipment and access cards. DIRECTV uses the information gathered from this process of supply chain tracking to gauge the effectiveness of its various distribution channels.

Specifically, DIRECTV receives reports from its equipment manufacturers that indicate the retailer account for particular shipments of equipment. Equipment and access cards are identified by unique equipment and access card serial numbers. When new customers call to activate their service they are required to provide the serial numbers on their equipment and on their access cards. From there it is a matter of cross-referencing.

[Redacted]

Billing

During the Call, representatives from the Commission asked whether new customers pay for a full month when they initiate service, whether they pay for a partial month until the beginning of the next calendar month, or if they are billed in arrears. Representatives from the Commission also asked if a DIRECTV billing expert could be made available for a future call.

DIRECTV bills all customers for service at the beginning of each service month. They are not billed in arrears. For example, customers who sign up on the 23rd of a month are promptly sent a bill for service from the 23rd of that month through the 22nd of the next month. They are then billed on the 23rd of each future month. [Redacted]. DIRECTV is ready and able to provide a company expert who can answer further questions on billing practices via conference call or at an in person meeting.

Equipment Subsidies

[Redacted]

Self-Installation

During the Call, DIRECTV agreed to identify what percentage of customers self-install their equipment and what percentage employ professional installation. [Redacted]

Respectfully submitted,



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*Counsel for Hughes Electronics Corporation,
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