

July 14, 2003

BY ELECTRONIC FILING

W. Kenneth Ferree
Chief, Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *Consolidated Application of General Motors Corporation, Hughes Electronics Corporation, and The News Corporation Limited for Authority to Transfer Control (MB Docket No. 03-124)*

Dear Mr. Ferree:

The News Corporation Limited (“News Corp.”), General Motors Corporation and Hughes Electronics Corporation (“Hughes”) (collectively, the “Applicants”) hereby set forth the procedures they plan to follow in initially responding to the Commission’s July 8, 2003 Initial Information and Document Request (“Request”). These procedures are designed to facilitate prompt responses to the Request by conforming certain search parameters to those being used by the Applicants in their ongoing responses to the requests for additional information under the Hart Scott Rodino (“HSR”) Act and drawing upon materials assembled in that process.

1. ***Relevant Time Frames:*** Documents responsive to the following requests shall be provided for the period beginning January 1, 2001: II.6, II.7, II.12, II.13, II.14, and II.15 through II.21 for News Corp. requests; and III.7, III.8, III.9, III.10, and III.11, for Hughes requests. Hughes will also provide an index of the documents that it produced to the Commission in the Hughes-EchoStar proceeding.
2. ***Relevant Service:*** The definition of the phrase “video programming” shall be amended by replacing the word “content” with the phrase “services, channels, or networks (including interactive capabilities).”
3. ***Available Data:*** Responses will be provided using the data and level of detail that Applicants maintain in the ordinary course of their businesses.
4. ***Requests for Analyses, etc.:*** To the extent the Requests call for analyses, assessments, or considerations of plans, cost and other matters, Applicants will produce final and draft plans, reports, etc. but no informal discussions and comments such as e-mails and notes.

5. **Document Review:** Applicants will respond to Requests that seek the production of existing documents by reviewing key documents collected from specified individuals for the response to the HSR Act requests for additional information. For each document Request, Applicants have provided the Commission with a list of the individuals from whose files they plan to collect responsive documents.
6. **Sports Programming:** For purposes of Request II.2.d, News Corp. shall respond with respect to the following sports leagues and conferences: the National Football League, National Basketball Association, National Hockey League, Major League Baseball; men's college football for all Division I-A and I-AA teams; men's college basketball for all Division I teams; and women's college basketball for teams competing in the South Eastern Conference, Atlantic Coast Conference, Big Ten Conference, Big East Conference, Big 12 Conference, or Pacific 10 Conference. In addition, in responding to Request II.2.d.5, News Corp. shall provide the total number of games available per team, league, or organization, without any representation as to whether such games could be or actually are made available to other networks.
7. **Request II.7:** The phrase "or non-exclusive" shall be stricken from Request II.7.
8. **Request III.1.b:** DIRECTV does not have the requested information regarding its competitors and need only provide information about its own operations.
9. **Request III.1.m:** DIRECTV does not maintain the data requested on a DMA basis. DIRECTV will instead provide national level information in its response.
10. **Request III.2.d:** DIRECTV will provide the data it has available to respond to this request.

Pursuant to the Commission's rules, 47 C.F.R. § 1.1206, please treat this letter as an *ex parte* presentation.

W. Kenneth Ferree
July 14, 2003
Page 3 of 3

In the event that you have any questions regarding the foregoing, we are available to discuss it with you at your convenience.

Sincerely yours,

\s\
William M. Wiltshire
Counsel for The News Corporation Limited

\s\
Gary M. Epstein

\s\
Richard E. Wiley
*Counsel for General Motors Corporation
and Hughes Electronics Corporation*

cc: Barbara Esbin
Marcia Glauberman
James Bird
JoAnn Lucanik
Doug Webbink
Linda Senecal
Neil Dellar
Simon Willkie
Tracy Waldon