

January 28, 2010

BY ELECTRONIC FILING

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

Re: *GN Docket No. 09-51, GN Docket No. 09-137, and CS Docket No. 97-80*

Dear Ms. Dortch:

On January 27, 2010, Romulo Pontual, Stacy Fuller and undersigned counsel on behalf of DIRECTV met with Commissioner Clyburn and Acting Chief of Staff Rick Kaplan to discuss the potential impact of a proposed mandate for a simple video “gateway” device raised in this proceeding. The DIRECTV representatives noted the company’s history of innovation, and discussed ongoing efforts for enhancing its subscribers’ viewing experience. They pointed out that, because DIRECTV’s satellite system relies principally upon one-way communications, much of that innovation has been implemented through intelligence in its set-top boxes, allowing it to achieve many of the capabilities commonly provided by two-way networks, such as cable. They explained that, by disrupting the integration between the satellite network and set-top box, a gateway mandate would impede innovation, and would also result in higher equipment prices and diminished levels of customer service. They urged that the Commission consider the potential effect on all video system architectures before proceeding further toward a gateway mandate.

Respectfully submitted,

/s/

William M. Wiltshire
Michael Nilsson
Counsel for DIRECTV

cc: Commissioner Clyburn
Rick Kaplan