



January 28, 2010

**BY ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 Bill Lake, Kris Monteith, Nancy Murphy, Brendan Murray, Elvis Stumbergs, and Alison Neplokh of the Commission's Media Bureau 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: Bill Lake  
Kris Monteith  
Nancy Murphy  
Brendan Murray  
Elvis Stumbergs  
Alison Neplokh