



National Cable & Telecommunications Association
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September 22, 2010

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

Re: Re: Unlicensed Operation in the TV Broadcast Bands, ET Docket No. 04-186 and Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band, ET Docket No. 02-380

Dear Ms. Dortch:

On September 22, 2010, I responded to an inquiry from Rick Kaplan, Chief Counsel and Senior Legal Advisor to Chairman Julius Genachowski, regarding NCTA's proposal for the protection of cable headends in the above-referenced docket. I directed Mr. Kaplan to the text of the proposed rule change contained in NCTA's December 22, 2009 filing and explained that it involved shifting the locus of cable headend protection from the broadcast station's protected service contour to the headend itself.

Respectfully submitted,

/s/ **Rick Chessen**

Rick Chessen

cc: Rick Kaplan