

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Preserving the Open Internet)	GN Docket No. 09-191
Broadband Industry Practices)	WC Docket No 07-52
)	
Further Inquiry Into Two)	
Under-Developed Issues in the)	DA 10-1667
Open Internet Proceeding)	

**REPLY COMMENTS OF THE
MOTION PICTURE ASSOCIATION OF AMERICA, INC.**

Michael O'Leary
Executive Vice President, Government Relations
Linda Kinney
Vice President, Regulatory Affairs
Motion Picture Association of America, Inc.
1600 Eye Street, N.W.
Washington, DC 20006

November 4, 2010

TABLE OF CONTENTS

	<u>Page</u>
I. INTRODUCTION AND SUMMARY	1
II. SPECIALIZED SERVICES	3
A. Commercial Agreements Between ISPs and Third Parties Are Beneficial.	3
B. A Preemptive Ban on All Prioritization Arrangements Would Harm Consumers.....	5
C. The Commission Should Refrain from Partitioning the Internet.....	8
D. The Commission Should Not Limit Specialized Services to Certain Categories.	9
E. Monitoring and Reporting Requirements Would Help Ensure a Robust Best-Efforts Internet Service.....	10
III. WIRELESS SERVICES	11
A. Mobile Wireless Broadband Providers Face Unique Challenges.	11
B. The Commission Should Avoid Adopting Regulations that Limit the Ability of Wireless Broadband Providers to Prevent Copyright Theft.....	12
C. The Commission Should Not Limit Commercial Agreements Between Broadband Providers and Third Parties.	12
IV. CONCLUSION.....	13

I. INTRODUCTION AND SUMMARY

The Motion Picture Association of America, Inc. ("MPAA"), on behalf of its member studios, Paramount Pictures Corporation, Sony Pictures Entertainment Inc., Twentieth Century Fox Film Corporation, Universal City Studios LLLP, Walt Disney Studios Motion Pictures, and Warner Bros. Entertainment, Inc., submits these comments in response to the Public Notice, DA 10-1667, released September 1, 2010, relating to two issues raised by the Commission in the Open Internet Proceeding— specialized services and mobile wireless.¹

As the dialogue around specialized services has progressed over the past year, almost all parties have come to realize that prioritizing certain services is not only necessary for the Internet to function efficiently, but also is beneficial to consumers of broadband services.² Indeed, a consensus has emerged that some level of prioritization is needed as part of *any* Internet service – even within the “best-efforts” Internet.³ Clearly, from the consumer perspective, it makes sense for the Commission to ensure that latency-sensitive services (such as voice over IP and video) can be delivered ahead of latency-tolerant services (such as e-mail). And, for some services – like streaming of high-quality video and smart-grid applications – quality-of-service guarantees may be necessary to ensure high-quality performance.⁴ These

¹ *Further Inquiry Into Two Under-Developed Issues in the Open Internet Proceeding*, DA 10-1667 (Public Notice released September 1, 2010) ("Public Notice").

² *See, e.g.*, Letter from Robert W. Quinn, Jr., AT&T, to Commission Secretary, in GN Dockets No. 09-191 and 10-127 (September 15, 2010) ("AT&T Letter"), pp. 1-6 (noting that the Open Technology Initiative at the New America Foundation and the Center for Democracy & Technology, leading proponents of net neutrality, agree with AT&T's position on key areas of traffic prioritization and that there is unanimous agreement that the Commission should not preemptively ban all forms of prioritization).

³ “Best efforts” Internet service uses good-faith efforts to deliver the highest-quality service under the circumstances.

⁴ *See, e.g.*, Comments of Alcatel-Lucent, pp. 4-5 (specialized services enable real-time applications that are highly sensitive to jitter); Comments of the Information Technology & Innovation Foundation, pp. 2-3, 9-12 (quality-
(cont'd)

services, both existing and future, can benefit from commercial agreements between the content source and Internet service provider (“ISP”), which can guarantee a certain quality-of-service (or “QoS”). Banning such arrangements would cut off innovation and the introduction of new and beneficial services, thus harming consumers and the public interest. Furthermore, the Commission would be discriminating against, if not foreclosing, services that are incompatible with a best-efforts approach, which precludes the very quality-of-service assurances that today’s consumers of streaming video demand.⁵

To the extent that the Commission adopts open Internet protections, non-discrimination provisions should only apply to a "best-efforts" broadband Internet access service marketed to residential consumers. The Commission should clarify that commercial agreements for enhanced performance will remain unregulated. Any attempt to shoehorn all broadband services into a one-size-fits-all service would be devastating for consumers, businesses, and the future of broadband networks in this country.

(cont'd from previous page)

of-service provisions enable such applications as telepresence and Content Delivery Networks); Report by Rysavy Research presented with Comments of Mobile Future, pp. 6-7.

⁵ See, e.g., Know More Survey from Radius Global Market Research, 3Q 2010 (stating that half of Radius’s survey audience indicated frustration with the lack of smoothness in streaming or buffering of content). Radius Global Market Research (formerly Data Development Worldwide) is one of the largest independent market research companies in the U.S. The company's proprietary tools provide unique insights, effective processes and unmatched experience resulting in proven return on investment for leading global marketers in categories including: consumer products, financial services, pharmaceutical, communications, and traditional/new media. The firm is No. 31 on the Honomichl listing of the top 50 U.S. market research organizations. Headquartered in New York, Radius employs more than 100 people in key markets throughout the U.S. and Europe. More information can be found at www.radius-global.com.

II. SPECIALIZED SERVICES

A. Commercial Agreements Between ISPs and Third Parties Are Beneficial.

We agree with the majority of commenters in this proceeding, representing a broad cross-section of interests, that the Commission should not restrict commercial arrangements with quality-of-service guarantees.⁶ These diverse parties – such as small independent businesses and non-profits, minority and low-income groups, manufacturers, satellite companies, content owners, and wireline broadband service providers of all sizes – recognize the critical need for a range of content delivery options, which will benefit consumers and businesses alike.

Tech-savvy consumers – particularly the next generation of youth in this country – are increasingly devouring content on an assortment of devices and in limitless locations.⁷ Demand is growing for online libraries of full-length films, interactive features, competitive gaming with high-tech graphics, live sporting events in HD, and many other bandwidth-hungry services. Based on a recent study, we also know that consumers are very interested in viewing television content over the Internet. Yet over half of the respondents indicated frustration with the lack of smoothness associated with streaming video.⁸ As these consumers have discovered,

⁶ See Comments filed in this proceeding October 12, 2010 by ADTRAN, Inc.; Center for Individual Freedom, The National Organizations (twenty four organizations including Minority Media and Telecommunications Council, NAACP, and the U.S. Hispanic Chamber of Commerce); Alcatel-Lucent; Hughes Network Systems, LLC; National Cable and Telecommunications Association; and by NECA, NTGCA, OPASTCO, ERTA, and WTA. See also Reply Comments filed in this proceeding on April 26, 2010 by The Songwriters Guild of America and MPAA.

⁷ For example, the Media Literacy Clearinghouse has compiled reports of studies measuring media consumption which show, among other results, that the amount of time children and teens spend on computers has tripled in the last ten years and the average amount of time 8 to 18-year-olds spend using various forms of media has increased from 7:29 in 1999 to 10:45 in 2009. <http://www.frankwbaker.com/mediause.htm>. See also, *Generation M²: Media in the Lives of 8- to 18-Year-Olds*, Report by the Kaiser Family Foundation, released January 20, 2010.

⁸ Know More Survey from Radius Global Market Research, 3Q 2010.

some services – such as streaming video and interactive gaming – require low levels of jitter (*i.e.*, variation in delay of packets) in order to work well.

To ensure that certain traffic receives an enhanced level of performance, ISPs generally provide their enterprise customers with network prioritization functionalities pursuant to service level agreements ("SLAs").⁹ Under an SLA, the service provider delivers the customer's traffic according to the customer's chosen quality-of-service ("QoS") parameters. These QoS parameters encompass performance categories such as delay in the delivery of packets, variation in such delay, packet loss, throughput and service availability.¹⁰ In addition, to increase the effectiveness of SLAs, standards-setting bodies are working to establish standardized classes with set SLAs for the exchange of traffic between networks.¹¹

If agreements between third-parties and ISPs for enhanced performance were not allowed, the Commission would be discriminating against, if not foreclosing, services that are incompatible with a best-efforts approach.¹² Banning all but a best-efforts model would deprive online viewers in the US – a world-leader when it comes to producing feature films – of a world-class online viewing experience. Moreover, copyright owners, who must use as many tools as

⁹ Comments of TW Telecom Inc., October 12, 2010, p. 3.

¹⁰ *Id.*

¹¹ *Id.* pp. 13-14, referring to: MEF Ratified ENNI Spec, LightReading, Feb. 11, 2010, available at http://www.lightreading.com/document.asp?doc_id=187856 ("This specification, which standardizes the reference point between service providers' MEF Certified Carrier Ethernet networks and services, marks a significant advance in the MEF's Global Interconnect Program. It will greatly accelerate the current lengthy and complex process of matching different providers' Carrier Ethernet services. By supporting standardized interconnect and Ethernet services spanning multiple-operator Ethernet networks, and bringing issues such as CoS, SLAs and management into line, the ENNI will have a major impact on the industry, with new global business opportunities for service providers and vendors. It will also generate even wider opportunities for world business with its promise of fast and cost-effective global interconnection.").

¹² Comments of Verizon and Verizon Wireless, October 12, 2010 ("Verizon Comments"), p. 47.

possible to combat content theft, would be prevented from differentiating their content by providing a better-quality experience than pirated sources.¹³

B. A Preemptive Ban on All Prioritization Arrangements Would Harm Consumers.

As the debate in this proceeding has progressed, demands for a ban on prioritization arrangements have proven misguided.¹⁴ There is now wide-spread agreement that the Commission should not preemptively ban all forms of prioritization.¹⁵ Current areas of agreement include: enterprise customers may arrange for prioritized delivery of certain Internet traffic in the event of network congestion;¹⁶ MVPD services should continue to receive QoS guarantees;¹⁷ and prioritization is permissible on "last mile facilities" when it is "directed and paid for by end users."¹⁸ In addition, many commenters point to third-party services that benefit the public – such as telemedicine and smart-grid applications – which may require enhanced quality-of-service guarantees to function properly.¹⁹

¹³ Forrester, "Charting Piracy: Analyzing File Sharing's Inconvenient Truths" 2008 Jupiter Research, p. 4 ("IPTV operators must reemphasize the better quality experience – including high definition picture quality and reliability – of their TV services compared with Internet piracy.").

¹⁴ For example, AT&T claims that the pro-regulation advocates that have been the most vocal in this proceeding are "oblivious to the real-world effects of their regulatory proposals." Comments of AT&T, October 12, 2010 ("AT&T Comments"), p. 5. Ionary Consulting asserts that, "[E]xtremist ideologues who have no real understanding of how service providers or enterprise customers operate. . . imagine, falsely, that the mere provision of sufficient capacity makes its "best effort" services appropriate for all tasks. But this viewpoint should not be taken seriously." Comments of Ionary Consulting, October 12, 2010 ("Ionary Comments"), p. 4.

¹⁵ AT&T Letter, p. 6.

¹⁶ Comments of the Center for Democracy & Technology, October 12, 2010 ("CDT Comments"), p. 3; AT&T Letter, p. 2.

¹⁷ See, e.g., Comments of the National Cable and Telecommunications Association, October 12, 2010, p. 5; Comments of Bright House Networks, LLC, October 12, 2010 ("Bright House Comments"), p. 20; Comments of Time Warner Cable Inc., October 12, 2010, p.9.

¹⁸ CDT Comments, p. 2.

¹⁹ See, e.g., Bright House Comments, p. 12-15; Comments of Charter Communications, October 12, 2010, p. 7.

Despite these areas of broad agreement, a few groups are still demanding that the Commission ban agreements for prioritization of Internet traffic at the direction of a "third-party" content provider.²⁰ What they fail to acknowledge is that some consumers would be worse off in a broadband world where the government prevents content owners from delivering the best possible online viewing experience and denies consumers the option of enjoying such an experience. When broadband networks suffer from congestion, Internet video experiences degraded service quality, including frame freezing, pixilation, interruption for buffering, or flutter of video. In fact, about half the people responding to the recent Radius survey said they have been frustrated by the "lack of smoothness in streaming or buffering" of online content.²¹ If the Commission were to ban third-party prioritization as suggested, content providers would be prevented from trying to fix this consumer problem by securing quality-of-service guarantees from ISPs. That would be a very regrettable public policy outcome.

Some commenters express concern that competition among, and future investment in, content, application, and service providers "could be harmed" if third-party prioritization were permitted.²² Putting aside the undeniable reality that the video programming marketplace today is highly competitive, assertions that any one company or even a group of companies could somehow "control" content on the Internet are simply not true.

²⁰ See, e.g., Comments of Free Press, October 12, 2010, p. 7; "An Architecture for Differentiated Service," Network Working Group Request for Comments 2475, December, 1998.

²¹ Radius Global Market Research Survey.

²² Public Notice, note 12, *citing* comments of Netflix, Inc., Software & Information Industry Association, and Vonage Holdings Corp., and Dish Network reply comments. For example, The Writers Guild of America, West, Inc. ("WGAW") claims that MPAA member companies "control" video programming and "could use the designation of specialized services to gain control of Internet content distribution." See WGAW Comments, October 12, 2010 ("WGAW Comments"), p. 4.

In reality, the dynamic marketplace is the arbiter of success or failure. Consumers vote constantly with their eyeballs and web clicks, and if content fails to resonate with the audience, it is not around long enough for people to miss it. Conversely, programming that captures the popular imagination is capable of gaining traction without regard to its origin. This phenomenon is borne out every day. A creative artist can begin as a YouTube sensation and, if appealing, can captivate an audience and sell millions of records.²³ Moreover, numerous online video delivery services (*e.g.*, Netflix, Amazon, etc.) aggregate content from diverse sources.²⁴ As the record demonstrates, fear about future harm to competition among content owners is misplaced and not grounded in facts or data.

On the other hand, pursuing a policy where only end-users can control prioritization, as some commenters suggest,²⁵ would result in a host of very *undesirable* consequences:

- Tech-savvy Internet users – particularly young kids who long ago surpassed adults with their knowledge of the Internet – would be able to designate their own packets with priority tags, leaving less savvy users to struggle with additional latency;
- Only businesses and residential users who can afford an extra fee would receive access to the best quality services, if the fee for QoS guarantees can only be paid by end-users;
- Content owners could not provide premium-quality streaming HD and 3D Internet video, reducing online video competition;

²³ For example, Canadian recording artist, Justin Bieber, was "discovered" when a marketing executive saw his homemade recordings on YouTube.com. <http://www.justinbiebermusic.com/bio.aspx>.

²⁴ Netflix offers a growing library of movies and TV shows streamed to consumers' computers, TVs, and other consumer electronic devices. Comments of Netflix, Inc., January 14, 2010. The company has the physical storage capacity to offer "just about all of the 60,000 movies, television shows, and how-to videos that are available on DVD (and that aren't pornography)," David Leonhardt, "What Netflix Could Teach Hollywood," *New York Times*, June 7, 2006. It is gradually acquiring rights to stream some of the more popular movies in its DVD collection. http://www.newsfactor.com/story.xhtml?story_id=1000037W2FRO&full_skip=1. Amazon.com has a similar streaming service, *see* www.amazon.com.

²⁵ *See, e.g.*, Letter of Center for Democracy & Technology to Commission Secretary, September 8, 2010, p. 2.

- Development of prioritized services (*e.g.*, smart grid, telemedicine, distance learning), while halted in this country, would continue to grow and prosper in other countries that will quickly surpass the US.

In sum, the Commission should not inhibit innovation and future business models by precluding commercial agreements with quality-of-service guarantees. Furthermore, parties should not be prevented from customizing their agreements through individualized terms and conditions, which provide flexibility and allow content providers to better address consumer demands.

C. The Commission Should Refrain from Partitioning the Internet.

We also urge the Commission to reject the suggestion that broadband providers be required to physically bifurcate Internet access streams from specialized service streams.²⁶ Separating out specialized services would harm – rather than benefit – best efforts Internet service, because a forced-segregation regime would waste capacity and deprive consumers of the economies of scale and scope that are prevalent in today's shared access platforms.²⁷

Those parties seeking additional regulation fail to take into account the nature of shared or "converged" networks. Specialized services are provided over the same pipe as broadband Internet access.²⁸ The packets associated with these services are designated for special handling during periods of congestion, but otherwise share the same physical platform as the packets associated with best-efforts Internet service. In fact, the best-efforts Internet

²⁶ Further Comments of Vonage Holdings Corp., October 12, 2010, p. 6.

²⁷ AT&T Comments, p. 9; Verizon Comments, p. 64; Comments of the Fiber-to-the-Home Council, October 12, 2010, p. 11.

²⁸ AT&T Comments, p. 36.

currently benefits from substantial additional bandwidth during non-peak hours, because the vast majority of the day is not impacted by traffic congestion.²⁹

Moreover, broadband networks vary dramatically in size and capacity. Any fixed requirement to dedicate a certain percentage of capacity to a best-efforts Internet service would be arbitrary and unfair. Such regulations would also be rapidly outdated, especially given the substantial public and private investment being made in broadband infrastructure³⁰ and new technologies. Similarly, to continue the public policy goal of encouraging broadband deployment and adoption, the Commission should not require ISPs to offer any Internet services on a stand-alone or unbundled basis. Indeed, for the last decade, the Commission has praised the various consumer-friendly bundles (like the double- and triple-play) that ISPs have offered consumers, and concluded time and again that these bundles are working to increase the pace of broadband deployment and adoption.

D. The Commission Should Not Limit Specialized Services to Certain Categories.

The Notice also requests comment on whether the category of "specialized services" should be limited to a set of new specialized services, with functionality that cannot be

²⁹ AT&T Comments, p. 37.

³⁰ The American Recovery and Reinvestment Act provided \$7.2 billion to expand access to broadband services in the U.S. See, <http://www2.ntia.doc.gov/about>. Since 2005, wired broadband providers have invested tens of billions of dollars, and created tens of thousands of jobs, to upgrade their networks. Comments of AT&T Inc., January 14, 2010, p. 5. The ten largest network service providers have annual capital investments in excess of \$50 billion. *Connecting America: The National Broadband Plan*, "Current State of the Broadband Ecosystem," p. 18.

provided via broadband Internet access service. We agree with the majority of commenters that this proposal harms consumers and should be rejected out of hand.³¹

A regulatory agency cannot predict which applications and services may require enhanced quality of service in the future. Any attempt to make such a predictive judgment would not only be unsuccessful, it would artificially skew the marketplace and prevent consumers from determining which prioritized services they value most.

E. Monitoring and Reporting Requirements Would Help Ensure a Robust Best-Efforts Internet Service.

For the reasons discussed above, we urge the Commission to avoid adopting any rigid standards and instead encourage the use of monitoring and reporting requirements to ensure that the best-efforts Internet remains robust. Broadband service providers maintain that, under sound economic theory, they are motivated to allocate adequate bandwidth capacity to all categories of services to maximize potential revenue recovery.³² Verizon claims that any provider that chose to allocate insufficient capacity for traditional Internet access "would quickly find itself losing customers to competitors."³³ We agree that maintaining a robust best-efforts Internet serves an important purpose,³⁴ and that collecting information about broadband capacity constraints is valuable to content providers as well as entrepreneurs, investors, and consumers.

³¹ See, e.g., AT&T Comments, pp. 31-32 ("this proposed restriction would be not only unprecedented and indefensible, but destructive"); Ionary Comments, p. 4 ("This is not merely a bad idea; it is a truly horrible one.").

³² Comments of Qwest Communications International Inc., October 12, 2010, pp. 11-12.

³³ Verizon Comments, p. 54.

³⁴ See, e.g., Comments of the Center for Democracy & Technology, January 14, 2010, p. 35; Reply Comments of International Documentary Association *et al.*, April 26, 2010, p. 16.

III. WIRELESS SERVICES

A. Mobile Wireless Broadband Providers Face Unique Challenges.

As the record in this proceeding demonstrates, wireless carriers are confronted with severe spectrum constraints at a time when bandwidth-hungry services are surging in popularity.³⁵ Wireless networks also face unique challenges given that spectrum for wireless broadband is shared among users and uses, and the number of subscribers located within the range of individual cell sites constantly fluctuates.³⁶ These limitations make it particularly difficult to consistently provide bit-rates needed for mobile video. To ensure a high-quality viewing experience, therefore, wireless providers must be extra vigilant when managing their networks,³⁷ especially when particular devices or applications result in excessive bandwidth consumption.

³⁵ See Statement of Chairman Julius Genachowski, *In re Preserving the Open Internet*, 24 FCC Rcd. 13064, 13155-56 (2009) (recognizing that there are real congestion and network management issues with regard to wireless broadband); see also, Comments of CTIA – the Wireless Association, October 12, 2010, ("CTIA Comments") p. 19; Verizon Comments, pp. 17-18; AT&T Comments, p. 58 (noting that global wireless data traffic is doubling annually, Cisco expects it to increase 39 times between 2009 and 2014, and Google predicts it will increase 66 times between 2008 and 2013; and quoting Chairman Genachowski's claim that, "Mobile data usage is not just growing, it's exploding."); and see Reply Comments of AT&T, April 26, 2010, pp. 93-94 (arguing against Andrew Afflerbach's and Matthew DeHaven's theory that immediately foreseeable technological advances will somehow resolve the spectrum crisis).

³⁶ See AT&T Comments, p. 59.

³⁷ See AT&T Comments, p. 60 (citing the explanation by Professor Jeffrey H. Reed and Dr. Nishith D. Tripathi that differentiation based on scheduling algorithms can maximize network throughput by dedicating network resources to the user or channel with the best conditions at a given moment, and the result is improved average throughput across all applications and users. *The Application of Network Neutrality Regulations to Wireless Systems: A Mission Infeasible*, pp. 43-44; filed with Comments of AT&T, January 14, 2010; see also Reed and Tripathi, *Wireless Net Neutrality Regulation: A Response to Afflerbach and DeHaven*, p. 22, filed with Reply Comments of AT&T, April 26, 2010; see also Richard Bennett, Information Technology & Innovation Foundation, *Going Mobile: Technology and Policy Issues in the Mobile Internet*, pp. 24-25, available at http://www.itif.org/files/100302_GoingMobile.pdf ("[S]chedul[ing] packets ... boost[s] the overall efficiency and effectiveness of the wireless network up to accepted wireline standards[.]").

B. The Commission Should Avoid Adopting Regulations that Limit the Ability of Wireless Broadband Providers to Prevent Copyright Theft.

The MPAA agrees with the concerns expressed by the unions and guilds that growth in wireless broadband services is likely to continue and may increasingly be used as a platform for the distribution of unauthorized copyrighted content.³⁸ To combat piracy over mobile platforms, the content community must be able to partner with the wireless industry to address copyright theft. Thus, we urge the Commission to refrain from adopting cumbersome regulations that could restrict the ability of wireless providers to detect or deter copyright violations or could prevent them from taking reasonable steps to address claims that copyrighted content is being transferred unlawfully.

C. The Commission Should Not Limit Commercial Agreements Between Broadband Providers and Third Parties.

Wireless broadband providers should have the flexibility to enter into innovative business arrangements with third parties. As discussed above in the context of wireline Internet service providers, the ability to experiment with new business models will be critical as mobile broadband services continue to evolve. Innovative content offerings – such as games, audio-visual programming and other applications – will be an important driver of consumer acceptance of these technologies. Given that mobile broadband is still in its infancy, imposing restrictions at this early stage would harm the public interest.³⁹

³⁸ Comments of the American Federation of Television and Radio Artists, Directors Guild of America, International Alliance of Theatrical Stage Employees, and Screen Actors Guild, October 12, 2010.

³⁹ MPAA's views on burdensome regulations apply equally to wireline providers. Thus, the Commission should refrain from imposing any "net neutrality" rules that would restrict the ability of wireline ISPs to manage their networks, and in particular their ability to use all available tools to detect, deter, or prevent copyright violations.

IV. CONCLUSION

Consumers today crave a high-quality viewing experience, and content creators must have the ability to develop innovative new models for online distribution to meet this demand. A prohibition on third-party prioritization agreements will harm consumers; they will be deprived of a wealth of services and content that benefit from these types of arrangements – from competitive online gaming and streaming of live events in HD, to interactive applications and smart grid control systems that require enhanced QoS guarantees to function properly. Based on the record in this proceeding, the Commission should clarify that content owners have the flexibility to enter into innovative business arrangements with both wireline and wireless broadband providers for the online delivery of digital content, in order to provide the high-quality services that consumers demand.

Respectfully submitted,

THE MOTION PICTURE ASSOCIATION
OF AMERICA, INC.

By: /s/

Michael O'Leary
Executive Vice President, Government Relations
Linda Kinney
Vice President, Regulatory Affairs
Motion Picture Association of America, Inc.
1600 Eye Street, N.W.
Washington, DC 20006

November 4, 2010