Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	MB Docket No. 10-71
Related to Retransmission Consent	)	

To: The Commission

REPLY COMMENTS OF UNIVISION COMMUNICATIONS INC.

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SUMMARY

Univision submits these reply comments to provide its unique perspective as a broadcaster that serves the rapidly growing U.S. Hispanic community. Univision's experience in successfully negotiating carriage agreements with cable, satellite, and telco providers across the country belies the contention of MVPD commenters that the Commission should dismantle the existing marketplace approach to the retransmission of broadcast programming. The many benefits of the distribution partnerships Univision has formed with MVPDs inure mutually to Hispanic viewers, Univision, and the MVPDs themselves.

Some MVPDs have argued that the Commission should prohibit broadcasters from offering discounted bundles of program services in connection with retransmission consent negotiations. Yet as cable programmers previously have demonstrated, offering multiple program services in a bundle provides newer networks a greater chance of survival and consumers greater programming variety, among other benefits. Retransmission consent negotiations similarly can create an opportunity to bring new, Spanish-language program services – such as three new services that Univision is developing – to MVPD subscribers in the Hispanic community. The regulatory proposals of the MVPD commenters, if adopted, would undermine these opportunities to enhance program diversity.

MVPD commenters also are mistaken in their criticism of arrangements by which a network negotiates retransmission consent agreements on behalf of its affiliates. These arrangements facilitate an efficient programming market and serve the public interest by increasing the already high likelihood of reaching satisfactory retransmission consent agreements with MVPDs, as networks have an incentive to see their programming widely distributed in as

many markets as possible. Indeed, one of the country's largest MVPDs has *required* Univision to negotiate a group retransmission consent agreement on behalf of its affiliates.

Network-led retransmission consent negotiations also provide the only means of counteracting the marketplace distortions of the compulsory licenses written into law over 30 years ago for the benefit of MVPDs. Were it not for the compelled licensing of copyrighted works to MVPDs, networks would have the same ability as cable programmers to determine the circumstances under which MVPDs would perform their works. MVPDs already gain significant advantage from these government-imposed licenses, and the Commission should not amplify that advantage by banning efficient negotiating arrangements between networks and their affiliates.

These and other proposals for regulatory intervention would force broadcasters to grant retransmission consent to MVPDs on subsidized, below-market terms, and viewers ultimately would bear the costs of those subsidies in the form of reduced program diversity and quality. Among other benefits to viewers, retransmission consent revenue has enabled Univision to introduce new Spanish-language VOD services, begin development of three new programming services, and produce and/or purchase rights to expensive marquee sports and other valuable programming uniquely responsive to the passion points of U.S. Hispanic viewers.

The private market for the retransmission of broadcast television signals functions efficiently and for the mutual benefit of broadcasters, MVPDs, and, above all, television viewers. To preserve program diversity, including in particular for the Hispanic community, Univision respectfully requests that the Commission reject calls for government intervention in arms-length negotiations between broadcasters and MVPDs.

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Univision Communications Inc. ("Univision") submits these reply comments to provide its unique perspective as a broadcaster that serves the rapidly growing U.S. Hispanic community and that – in a period of little more than two years following its initial election of retransmission consent – entered into over 150 carriage agreements with multichannel video program distributors ("MVPDs") of all sizes throughout the United States.[1] The mutually beneficial distribution partnerships that Univision has formed with MVPDs across the country demonstrate that federal intervention in the retransmission consent marketplace would be inappropriate and unnecessary.

The proposals for intervention advocated by some commenters in this proceeding would harm the public interest by undermining Univision's ability to continue investing in high-quality news, sports, and entertainment programming for the Hispanic community. In particular, and contrary to the contentions of the proponents of regulatory intervention, (1) negotiation for carriage of commonly owned program services, including broadcast stations, fosters program diversity, and (2) negotiation by networks on behalf of their affiliates is an efficient, mutually

[1] Univision is the indirect parent of the licensees of 62 full-power, Class A and low-power television stations across the country, most of which are affiliated with its Univision and TeleFutura Networks.

beneficial means for broadcasters and MVPDs to reach carriage agreements. The Commission accordingly should continue to allow negotiations between broadcasters and MVPDs to take place in a free "marketplace for the disposition of rights to retransmit broadcast signals," as required by Congress.[2]

I. UNIVISION'S EXPERIENCE IN NEGOTIATING CARRIAGE AGREEMENTS DEMONSTRATES THAT THE RETRANSMISSION CONSENT PROCESS BENEFITS ALL PARTIES.

Univision's experience in successfully negotiating carriage agreements with cable, satellite, and telco providers across the country belies the narrative of some MVPDs, which argue that the retransmission consent regime is "broken" and that the Commission should weaken the existing marketplace approach.[3] In fact, the distribution partnerships Univision has formed with MVPDs inure to the mutual benefit of Hispanic viewers, Univision and the MVPDs themselves.

In 2008, having historically provided its programming to cable and other subscription television services without any compensation pursuant to the "must carry" rules, Univision determined that fair compensation from its MVPD partners would be necessary to sustain continued investment in quality programming and services for the Hispanic community. Just as non-broadcast programmers such as commenter Discovery Communications LLC ("Discovery") rely upon the dual-revenue stream of advertising and program license fees (and other non-cash consideration), Univision sought retransmission consent compensation from MVPDs so that it could recoup a portion of the high cost of developing and acquiring the highly

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[2] *See* Comments of the National Association of Broadcasters ("NAB") at 18, *quoting* S. Rep. No. 102-92 at 34-35, 37 (1991).

[3] *See*, *e.g.*, Comments of DISH Network at 1; Comments of Time Warner Cable at 13.

rated programming broadcast by Univision and its affiliates. Revenue from retransmission consent enables Univision to expand its mission of informing, entertaining and empowering the Hispanic community, which at over 50 million persons accounts for some 16 percent of the U.S. population.[4]

In comments filed last year in response to the Petition in this proceeding, Univision documented the many new and enhanced content offerings made possible for viewers by its decision to elect retransmission consent status for its broadcast stations.[5] For example, in 2009, after most of its current retransmission consent deals were signed, Univision launched a new Spanish language video-on-demand ("VOD") service, with more than 50 hours of content refreshed every month. Shortly after launch of that VOD service, Glenn Britt, the Chairman, President and Chief Executive Officer of commenter Time Warner Cable Inc. ("TWC"), observed that "the Hispanic VOD service that we just launched [is] an example of how we can work with programmers, where sometimes people anticipate a hostile situation, but we and Univision and the others are working together to create a great new service for customers."[6] Earlier this year, Univision launched TeleFutura On Demand, featuring programming from its TeleFutura broadcast network. More recently, Univision announced plans to launch three new Spanish-language program services in the coming year, each of which will serve one of the "passion points" for U.S. Hispanics: news and information; sports, especially soccer; and telenovelas. These and other examples in the record make clear that the right of a broadcaster to

[4] *See* Michael Martinez and David Ariosto, CNN.com (March 24, 2011) (reporting on U.S. Census Bureau data), *at* http://articles.cnn.com/2011-03-24/us/census.hispanics_1_hispanic-population-illegal-immigration-foreign-born?_s=PM:US

[5] *See* Comments of Univision Communications Inc., MB Docket No. 10-71 (filed May 18, 2010).

negotiate for carriage of its signal(s) is a market-based mechanism that facilitates mutually beneficial partnerships between broadcasters and subscription television providers.[7]

II. THE COMMISSION SHOULD REJECT CALLS FOR GOVERNMENT INTERVENTION IN THE RETRANSMISSION CONSENT MARKETPLACE.

Univision respectfully disagrees with the requests of some MVPDs for government intervention in the retransmission consent marketplace. At the outset and as has been demonstrated by the NAB, The Walt Disney Company, CBS Corporation, and others, Congress has not provided the Commission with authority to intervene in these private market negotiations (*e.g.*, by imposition of a "standstill mechanism" that mandates continued carriage following expiration of an agreement).[8] It is not necessary to reiterate these statutory analyses here. Univision instead takes this opportunity to underscore the public interest harms that government intervention in the retransmission consent marketplace would cause to the interests of Hispanic viewers in particular.

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[6] Time Warner Cable, Inc., Q3 2009 Earnings Call (Nov. 5, 2009), Statement of Glenn A. Britt - President, Chief Executive Officer, Director.

[7] *See, e.g.*, Press Release: Univision signs multi-year carriage agreement with DirecTV, released March 3, 2009, http://www.univision.net/corp/en/pr/New_York_03032009-1.html#null. *See also*, Press Release: DISH Network(R) Reaches Agreement to Deliver Univision, TeleFutura and Galavision to DISH Network, released April 1, 2009, http://dish.client.shareholder.com/releasedetail.cfm?ReleaseID=374851; Press Release: Univision and Verizon Announce Multi-Year Carriage Agreement, released April 20, 2009, http://www.univision.net/corp/en/pr/New_York_20042009-1.html#null; Press Release: Univision Announces Multi-Year Carriage Agreement with Cox Communications, released June 24, 2009, http://www.univision.net/corp/en/pr/New_York_24062009-0.html; Press Release: Univision Announces Multi-Year Carriage Agreement with Mediacom Communications, Signs More than 100 deals in First Half of 2009, released June 24, 2009, http://www.univision.net/corp/en/pr/New_York_24062009-1.html#null. See, also, "Univision Fortifies Retransmission Consent Roster," Laura Marinez and Mike Reynolds, *Multichannel News*, June 24, 2009 (quoting a spokesperson for Cablevision Systems Corp. that "we have concluded our discussions with Univision and we are pleased with the results").

[8] *See, e.g.*, Comments of Disney at 3-6 and 9-10; Comments of the NAB at 17-19, *passim*; Comments of CBS Corp. at 15-19.

A. Negotiation of Rights to Multiple, Commonly Owned Program Services Advances the Development of New Spanish-Language Programming and Services.

Some MVPDs have argued that the Commission should prohibit the negotiation for carriage of commonly owned stations and program services together. Yet arrangements in which broadcasters negotiate to grant retransmission consent in exchange for a mix of consideration that includes non-cash, in-kind consideration – such as an agreement by the MVPD to carry a new program service – have served program diversity well. As the record reflects, broadcasters launched now-popular English-language services such as Home and Garden, Lifetime, and the A&E Television Networks (including A&E and the History Channel) in connection with retransmission consent negotiations.[9] Retransmission consent negotiations similarly can provide an opportunity to bring new, Spanish-language program services to MVPD subscribers in the Hispanic community. The Commission should not adopt new regulations that would undermine these opportunities to enhance program diversity.

Univision's experience in negotiating carriage for multiple, commonly owned program services illustrates the benefits of offering program "bundles" in connection with retransmission consent negotiations. Currently, Univision offers multiple programming services: Univision Network, one of the top five networks in the U.S. regardless of language and the most-watched Spanish-language broadcast television network in the U.S., reaching 95% of U.S. Hispanic Households; TeleFutura Network, a general-interest Spanish-language broadcast television network, reaching 85% of U.S. Hispanic Households; Galavisión, the country's leading Spanish-language cable network; two Spanish-language movie channels; and three Latin

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[9] *See* Comments of the NAB at 54-55.

music channels. Univision does not engage in "tying," in which an MVPD has no choice but to carry all its program services. Instead, as in any product bundle, Univision offers a discount to MVPDs willing to carry all its services. As federal courts have explained, "where the buyer is free to take either product by itself, there is no tying problem even though the seller may also offer the two items as a unit at a single price."[10]

The ability to incentivize carriage of new program services by offering them as part of a discounted bundle is critical. As noted above, Univision is preparing to launch three new Spanish-language program services in the coming year. These new services will uniquely serve the interests of U.S. Hispanic viewers. Univision may use its digital broadcast spectrum to multicast some of these services over the air, but securing cable and satellite carriage is essential to their ultimate success. Imposition of a regulation preventing or hindering Univision from negotiating for carriage of these new services as part of a bundle with its existing broadcast services would reduce the likelihood that Hispanic MVPD subscribers would ever have access to them.

Like Univision, cable programmers such as Discovery and Time Warner Inc. commonly offer their program services in bundles as well as on a standalone basis.[11] The fact that some program services (whether broadcast or non-broadcast) are more desired by subscribers and thus can receive greater compensation (including in-kind consideration) from distributors does not justify regulatory intervention in the marketplace. In fact, it is demonstrative of an efficient, rational market. New program services offered by Univision

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[10] *Marts v. Xerox, Inc.*, 77 F.3d 1109, 1112 (8th Cir. 1996) (citing *N. Pacific Railroad Co. v. U.S.*, 356 U.S. 1, 6 n.4 (1958)).

[11] *See, e.g.*, Comments of Time Warner Inc., MB Docket Nos. 07-29 and 07-198, at 19-23 (filed Jan. 4, 2008) (describing the benefits of offering multiple program services in a bundle as part of carriage negotiations).

should have the same chance of success as new program services offered by Discovery or any other cable programmer.

Indeed, Discovery emphasized the importance of bundling to program diversity and economic efficiency in its 2008 comments to the Commission in opposition to a proposed rule to prohibit the offering of bundled program services by cable programmers. Discovery explained that allowing programmers to offer their services on a bundled basis

> (1) "saves significant processing, negotiating, and legal costs" that allow programmers to "expand distribution of their services in the most efficient and cost effective manner;"
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> (2) "provides more opportunities for give and take in the negotiation process, [because t]he greater number of terms that are on the table, the greater the likelihood that the parties can compromise on some terms (*e.g.*, a less preferred tier for one programming service) in return for a better result (*e.g.*, better price) for another service at issue;" *and*
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> (3) "gives newer networks a greater chance of survival and consumers greater programming variety."[12]

Univision agrees with Discovery's articulation of the benefits of bundling, including with respect to the launch of new program services. Contrary to those past statements, however, Discovery in *this* proceeding argues that broadcasters should not be able to offer program bundles as part of retransmission consent negotiations. But the findings of Discovery's own economist, Jonathan M. Orszag, in support of Discovery's 2008 filing demonstrate the failings of its current proposal. In his affidavit in that proceeding, Mr. Orszag concluded that "[a]s there are existing laws and regulations to address any tying conduct of concern for consumers of video programming, the benefits of any new regulation against any anticompetitive tying conduct are likely to be quite limited," in contrast to the "decrease . . . in consumer and social welfare" that would result under the "blunt instrument of a *per se* rule."[13] While Discovery attempts to justify imposing an anti-bundling restriction on broadcasters under the false hypothesis that broadcasters have market power, Mr. Orszag's testimony makes clear that the Commission should reject calls to adopt regulations prohibiting bundling regardless of a service's popularity. There is no basis upon which to impose a new anti-bundling regulation on programmers, whether broadcast or non-broadcast.

Notably, the Commission did not adopt anti-bundling rules for cable programmers following the 2008 comment cycle, and more broadly it long has recognized that regulatory intervention is appropriate only in the case of a program service owned by an MVPD, because in that case the programmer has an incentive to withhold programming or charge supra-competitive prices to unaffiliated distributors.[14] In contrast, programmers like Univision have every incentive to ensure that their content is widely distributed – as demonstrated by the many retransmission consent arrangements entered into by Univision with large and small MVPDs alike.

Indeed, looking beyond the programming marketplace, the offering of broadcast and non-broadcast bundles to partners in the MVPD sector is no less appropriate and pro-competitive than the practice of cable operators and telcos that offer consumers "triple play" cable / voice / broadband bundles. As TWC explained in a Petition for Declaratory Ruling concerning the interconnection obligations of rural local exchange carriers, "TWC offers [retail VoIP] customers added value and convenience by providing discounts for bundles that include

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[12] *See* Reply Comments of Discovery Communications LLC, MB Docket Nos. 07-29 and 07-198, at 11-14 (filed Feb. 12, 2008).

[13] *Id*., at Att. A, p. 24.

its video and broadband Internet access services."[15] TWC went so far as to suggest in a subsequent filing that its entry into new geographic areas actually was dependent upon its ability to "offer all of its triple-play services (video, broadband, and voice)."[16] The efficiencies created by offering bundled programming services as part of retransmission consent negotiations similarly facilitate the introduction of new programming to the public.

B. Negotiation by Networks on Behalf of Their Affiliates Provides an Efficient Means of Reaching Agreement With MVPDs on Terms of Carriage and Counteract the Market Distortions of the Compulsory Licenses.

Univision has negotiated many retransmission consent agreements on behalf of its affiliates, and these "proxy" arrangements have provided an efficient means for Univision and its MVPD partners to come to agreement on terms of retransmission consent throughout the MVPD's footprint. To the extent that a network and its affiliates decide to enter into these arrangements, the Commission should not prohibit them.

Contrary to the arguments that MVPD commenters make now, one of the largest MVPDs in the country actually *required* Univision to negotiate a group retransmission consent agreement on behalf of its affiliates. At that time, not all of Univision's affiliates had the resources to negotiate retransmission consent with the largest MVPDs. In fact, at the start of its most recent round of negotiations, one of Univision's largest affiliates had just filed for bankruptcy. As TWC acknowledges in its comments, "a network's use of a 'clearinghouse' model for the disposition of its affiliates' retransmission consent rights may, in some cases, bring

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[14] *See, e.g.*, 47 C.F.R. § 76.1000, *et seq*.

[15] Petition for Preemption of CRC Communications of Maine, Inc. and Time Warner Cable Inc., WC Docket No. 10-143, at 3 (filed July 15, 2010).

[16] Ex Parte Letter of Time Warner Cable Inc., WC Docket No. 10-143 (filed March 1, 2011).

efficiencies by reducing transaction costs for stations and MVPDs alike."[17] Far from contributing to an alleged "take-down crisis,"[18] the negotiation of group retransmission consent agreements by networks increases the already high likelihood of reaching a satisfactory retransmission consent agreement. Networks have an incentive to see their programming widely distributed in as many markets as possible.[19]

MVPDs seeking a government ban on proxy arrangements erroneously conceive of same-network affiliates operating in different markets as would-be "competitors" for the negotiation of retransmission rights to network programming. Under this worldview, a network that negotiates retransmission consent for its affiliates "interferes" in the "market" for retransmission of network programming.[20] In fact, network-led retransmission consent negotiations provide the only means of counteracting the marketplace distortions of the government benefit provided to MVPDs in the form of the compulsory licenses of Sections 111, 119, and 122 of the Copyright Act of 1976, as amended.

Were it not for the compulsory licenses, networks and other program owners could control the circumstances under which MVPDs could publicly perform their copyrighted works through broadcast retransmissions. The compulsory license, however, eliminates by regulatory fiat the right that most other content owners (including all cable networks) have to

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[17] Comments of Time Warner Cable at 34.

[18] Comments of DISH Network at 17.

[19] Of course, following good faith negotiations, a cable operator and a programmer may not come to agreement on the value of a station's signal, in which case carriage of the station will ultimately end. For example, in one recent negotiation Univision was unable to reach agreement with a cable operator in Rhode Island on the value of a signal that the operator had imported from another market out of state, even after Univision granted that operator numerous extensions while negotiations continued. Even in that case, however, the parties were able to reach agreement on the value of the Univision Network feed, which the system now carries rather than an out-of-state signal.

[20] *See, e.g.*, Comments of the United States Telecom Association at 24-26.

control terms of carriage. In addition, the U.S. Copyright Office has found consistently that the compulsory license fees paid by MVPDs for distant retransmission of broadcast programming are below the rates that copyright owners could earn in a free market system.[21] Thus, what commenters such as Mediacom refer to as "network interference in, and abuse of, the retransmission consent process" provides a network's only means of overcoming the forced licensing of its works to MVPDs. Univision is not calling for elimination of the compulsory licenses,[22] but the record should be clear that MVPDs gain significant advantage from these government-imposed licenses.[23]

C. The Commission Should Reject Other Proposals to Interfere in the Retransmission Consent Market.

The Commission should reject the multiple other proposals for regulatory intervention that would provide MVPDs an artificial advantage in negotiations for retransmission consent rights. For example:

- Mandatory Most-Favored-Nations Clauses. Commenters such as the Organization for the Promotion and Advancement of Small Telecommunications Companies, *et al*. ask the Commission to regulate the amount of fees that broadcasters can negotiate in exchange for granting retransmission consent to cable systems of a certain size.[24] In effect, this proposal would impose a common carrier-like pricing standard on broadcasters. Such a rule would represent the opposite of the market-based system mandated by Congress.

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[21] *See, e.g.*, Satellite Home Viewer Extension and Reauthorization Act Section 109 Report, Register of Copyrights, at vi (rel. June 30, 2008) ("Based on the record in this proceeding, it appears that the royalties in the statutory licenses are set at below-market levels").

[22] *See, e.g.*, Comments to the Copyright Office of the Program Suppliers, Docket No. RM 2010-10 (filed April 25, 2011) (supporting a phase-out of the compulsory licenses).

[23] Moreover, MVPDs themselves have recognized the benefits of proxy arrangements in other contexts. Small cable operators, for example, formed the National Cable Telecommunications Cooperative ("NCTC") to purchase rights to cable programming and hardware, and the Department of Justice has recognized the efficiencies of this joint bargaining arrangement. *See* Letter of R. Hewitt Pate, Assistant Attorney General of the U.S. Dept. of Justice to Robert E. Marsh, counsel to the NCTC (Oct. 17, 2003).

[24] *See* Comments of the Organization for the Promotion and Advancement of Small Telecommunications Companies at 25.

- Forced standstill agreements. Univision and other broadcasters grant short-term retransmission consent extensions to MVPDs of all sizes when there is reason to believe that additional, good-faith negotiations will result in a mutually satisfactory agreement. The Commission should not, however, mandate standstill agreements. As Time Warner Inc. (then affiliated with TWC) explained in January 2008 with respect to a proposed standstill requirement in cable program access proceedings, "With a standstill in place, an MVPD would not face the prospect of losing access to a network and, therefore, would have reduced incentives to negotiate a carriage agreement with the network."[25]

These and other proposals for regulatory intervention would force broadcasters to grant retransmission consent to MVPDs on subsidized, below-market terms, and viewers ultimately would bear the costs of these subsidies in the form of reduced program diversity and quality. Revenue from retransmission consent – under the currently regulatory regime – has had demonstrable benefits for Univision viewers, including the introduction of new Spanish language VOD services and the ongoing development of three new programming services that Univision is tailoring to meet the unique needs of U.S. Hispanic viewers. Revenue from retransmission consent also enables Univision to produce and/or purchase rights to marquee sports and other valuable programming. For example, Univision has continued to air Spanish language coverage of the FIFA World Cup, despite the growing expense of securing rights to such popular sports programming. In the first two days of coverage for the 2010 FIFA World Cup, more viewers watched Univision's coverage of the World Cup than watched the English-language coverage aired by ESPN and ABC in Los Angeles, Miami, Houston, and Dallas – demonstrating the significant interest in the World Cup among the Hispanic community. Without fair retransmission consent compensation, however, Univision may not be able to invest in desirable content like the World Cup in the future.

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[25] Comments of Time Warner Inc., *supra* note 11 at 14.

CONCLUSION

Univision's experience in reaching mutually beneficial retransmission consent agreements with MVPDs of all sizes demonstrates that the retransmission consent process functions as intended by Congress. To preserve program diversity, including in particular for the Hispanic community, Univision respectfully requests that the Commission reject calls for government intervention in arms-length negotiations between broadcasters and MVPDs.

Respectfully submitted,

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