

May 14, 2012

EX PARTE

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, DC 20554

Re: Carriage of Digital Television Broadcast Signals:  
Amendment to Part 76 of The Commission's Rules, CS Docket No. 98-120

Dear Ms. Dortch:

On May 10, 2012, Tom Wilson, Counsel, Sabin Bermant & Gould, and I met with Michelle Carey, Alison Neplokh, Mary Beth Murphy, Steven Broeckaert, John Gabrysch, and Evan Baranoff from the Media Bureau, as well as Susan Aaron from the Office of General Counsel, to discuss the above-referenced proceeding. On behalf of Bright House Networks, LLC ("BHN"), we discussed the potential consumer impact if the Commission were to allow the Dual Carriage rule to sunset.

We emphasized that BHN is committed to minimizing any adverse consumer consequences that might otherwise be associated with terminating analog delivery of a must carry signal. In particular, BHN would provide ample notice to all customers of any such operational change and would explain how customers interested in maintaining access to a particular must carry signal could acquire digital reception capability through BHN or third-parties. We further noted that BHN would provide any affected broadcasters with prior notice. We also emphasized that BHN already makes digital converters available to customers subscribing only to the basic service tier for just \$1 per month.

We also discussed that in the past, when BHN migrated other PBS and low power stations from analog to digital on the BST, it trained CSRs to understand the equipment and pricing available to these affected customers, made sure it had an adequate supply of equipment on hand to accommodate the anticipated demand, and generally coordinated the transition with the station so it had adequate time to inform its viewers of the change through its broadcasts and websites.

BHN respectfully submits that similar efforts in the future would minimize any potential viewer disruption that might be triggered by the sunset of the Dual Carriage rule. To the extent the Commission has any concerns that cable operators might not adequately publicize the change, BHN notes that any affected must carry station can easily communicate with interested viewers in the period between receiving notice of an impending delivery change and the actual implementation of that delivery change. During that period, the must carry station can broadcast messages to interested viewers explaining the upcoming change and the readily-available equipment options.

Please contact the undersigned if you have any questions regarding these issues.

Very truly yours,

Steven J. Horvitz

cc: Michelle Carey  
Alison Neplokh  
Mary Beth Murphy  
Steven Broeckaert  
John Gabrysch  
Evan Baranoff  
Susan Aaron