



June 14, 2012

BY ELECTRONIC FILING

Marlene H. Dortch
445 12th Street, S.W.
Room TW-A325
Washington, DC 20554

Re: Amendment of the Commission's Rules Related to Retransmission Consent, MB Docket No. 10-71

Establishment of a Model for Predicting Digital Broadcast Television Field Strength Received at Individual Locations, ET Docket No. 10-152

Applications of Cellco Partnership d/b/a/ Verizon Wireless, SpectrumCo, LLC, and Cox TMI Wireless, LLC for Consent to Assign Wireless Licenses, WT Docket No. 12-4

Service Rules for Advanced Wireless Services in the 2000-2020 MHz and 2180-2200 MHz Bands, WT Docket No. 12-70

Fixed and Mobile Services in the Mobile Satellite Service Bands at 1525-1559 MHz and 1626.5-1660.5 MHz, 1610-1626.5 MHz and 2483.5-2500 MHz, and 2000-2020 MHz and 2180-2200 MHz Bands, ET Docket No. 10-142

Service Rules for Advanced Wireless Services in the 1915-1920 MHz, 1995-2000 MHz, 2020-2025 MHz and 2175-2180 MHz Bands WT Docket No. 04-356

Dear Ms. Dortch:

On June 12, 2012, DIRECTV's Chairman and CEO Mike White met with Commissioner Clyburn, Dave Grimaldi, Louis Peraertz, and Suman Tatapudy. Also present on behalf of DIRECTV were Susan Eid, Executive Vice President, Government Affairs, and Stacy Fuller, Vice President, Regulatory Affairs.

During the meeting, the parties provided a general overview of DIRECTV's operations and discussed the regulatory issues described below that affect its business.

- Mr. White discussed DIRECTV's ongoing concerns with programming costs generally, and with retransmission consent specifically. He also urged the Commission to continually improve and update the computer model used to predict whether subscribers are in fact "served" by broadcast stations, so that those who are truly unable to receive off-air signals can receive distant signals instead.

We also reiterated our longstanding position that the Commission should take the following actions to protect consumers against blackouts and rising costs:

- establish that the obligation to negotiate in good faith requires broadcasters to allow temporary importation of distant signals in case of bargaining impasse;
- recognize that joint arrangements among stations and approval rights by networks result in an attributable interest; and
- require broadcasters to give stand-alone offers to prevent bundling of less desirable stations or cable channels.

(We have set forth this position repeatedly in MB Docket No. 10-71, including in comments and reply comments.)

- Mr. White asked the FCC to consider the effect the proposed arrangements between the nation's largest wireless carrier and the largest cable operators would have on the video marketplace. (We have described our concerns in more detail in our comments in WT Docket No. 12-4.)
- Mr. White expressed DIRECTV's support for the proposals contained in the Commission's *2 GHZ MSS NPRM* and our belief that the proposals would serve the public interest by ensuring that this spectrum is put to productive use expeditiously.

Pursuant to the Commission's rules, I am filing one copy of this letter electronically in each of the listed dockets.

Sincerely,

/s/

Stacy Fuller
Vice President, Regulatory Affairs

cc: Mignon Clyburn
Dave Grimaldi
Louis Peraertz
Suman Tatpudy