



August 17, 2012

BY ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: *MB Docket No. 11-154*

Dear Ms. Dortch:

This is to inform you that, on August 16, 2012, undersigned counsel on behalf of DIRECTV, LLC spoke by telephone with Lyle Elder, Attorney-Advisor to Chairman Genachowski, with respect to the Petitions for Temporary Partial Exemption or Limited Waiver filed by the Digital Media Association in the above referenced proceeding. In particular, counsel pointed out that many VPDs (including DIRECTV) depend upon third party video players to decode and render video programming delivered to various platforms via Internet protocol. DIRECTV has been working diligently with those third parties to implement the required capabilities, but it appears that at least some of them will not achieve that goal by the September 30, 2012 implementation deadline. This is perhaps not surprising, given that the Commission gave those third parties that are not also VPDs more than a full extra year – until January 1, 2014 – to develop the technologies necessary to implement this capability for their own uses. If they comply with their own deadline, they will not have products ready such that DIRECTV can comply with its earlier deadline. Given this timing issue, the waiver requested for the “rendering” obligation is clearly justified.

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV, LLC

cc: Lyle Elder