



WILTSHIRE  
& GRANNIS LLP

October 3, 2012

**BY ELECTRONIC FILING**

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

Re: *Revision of the Commission's Program Access Rules*, MB Docket No. 12-68;  
*News Corporation, The DIRECTV Group, Inc., and Liberty Media Corporation*,  
MB Docket No. 07-18; *Adelphia Communications Corporation, Time Warner  
Cable Inc., and Comcast Corporation*, MB Docket No. 05-192

Dear Ms. Dortch:

On October 2, 2012, Stacy Fuller of DIRECTV, LLC ("DIRECTV") and undersigned counsel met with Elizabeth Andrion, Acting Chief of the Commission's Office of Strategic Planning & Policy Analysis, and Lyle Elder, Attorney-Advisor to Chairman Genachowski, to discuss the above referenced proceedings. We began by reiterating the necessity for extension of the cable exclusivity prohibition in its entirety, or at a minimum with respect to national and regional sports programming, as reliance upon a case-by-case complaint procedure and merger conditions would be a poor substitute for a clear rule of general applicability. We then proceeded to discuss the proposals in DIRECTV's September 21, 2012 *ex parte* designed to minimize consumer disruption, improve the remaining program access rules, and streamline the process for seeking redress should the Commission nonetheless decide to allow the current rule to sunset.<sup>1</sup>

Respectfully submitted,

/s/

---

William M. Wiltshire  
*Counsel for DIRECTV, LLC*

cc: Elizabeth Andrion  
Lyle Elder

---

<sup>1</sup> See Letter from William M. Wiltshire to Marlene H. Dortch, MB Docket Nos. 12-68, 07-18, and 05-192 (filed Sept. 21, 2012).