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July 15, 2013

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *Ex parte meeting -- CG No. 10-213*

Dear Ms. Dortch:

On July 11, 2013, Jim Morgan of Sony Electronics Inc. and the undersigned met with Louis Peraert, Legal Advisor to Acting Chairwoman Clyburn, to discuss the Petition for Waiver of the Commission's rules governing devices used to access advanced communications services filed May 16, 2013 by the Coalition of E-Reader Manufacturers.

The parties stated that the Petition established that an e-reader device meets the waiver standard in the Commission's rules because while the device "is capable of accessing an advanced communications service" it is "designed primarily for purposes other than using advanced communications services," namely the display of digital written work. The parties then discussed the scope of the requested waiver and explained that it was intended to cover only mobile hardware devices devoted primarily to accessing digital written works, and that the Coalition does not seek a waiver for general-purpose tablets. Thus, the Coalition's representatives stated that the requested waiver would cover e-readers but it would not cover general-purpose tablets. The parties added that if e-readers in the future add features and capabilities that cause them to resemble tablets with full and readily available ACS functionality then those devices would be regulated the same as tablets. But as long as e-readers remain primarily designed for accessing digital written works they should be subject to the waiver.

The parties emphasized the need for the proposed waiver. They explained that e-readers are designed and optimized for accessing digital written work, which is reflected in their composition and marketing, and they contain rudimentary Web browsers that are incidental to the reading purpose and serve to facilitate purchasing books or consulting dictionaries or reference works such as Wikipedia. The Coalition representatives stated that e-readers are overwhelmingly *not* used for general-purpose Web browsing. They stated that e-readers are just the kind of devices for which Congress created the waiver provision.

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Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink that reads "Gerard J. Waldron". The signature is written in a cursive, slightly slanted style.

Gerard J. Waldron
Counsel for Amazon.com, Inc.; Kobo Inc.;
and Sony Electronics Inc.

cc: Mr. Louis Peraertz