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November 27, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: *MB Docket No. 12-3 -- Ex parte meeting*

On November 25, 2013, Ken Edmonds with the National Football League and the undersigned met with Maria Kirby, Legal Advisor to Chairman Wheeler, to discuss the League's broad media policy and how the FCC's sports blackout rule serves the public interest by promoting popular sports to remain on broadcast television and in that context protects the broadcast model.

We explained that for many years the NFL, almost alone among the major sports leagues, has stayed committed to having its games on free, over-the-air broadcasting. Evidence of that commitment can be found in the recent long-term contract the League entered with its broadcast partners that will ensure NFL games are available on broadcast television well into the next decade. We emphasized that the overwhelming majority of NFL games are available to local fans, and the rare occurrence is when there is not a sell-out 72 hours in advance. In fact, blackouts are a small and shrinking problem: fewer than 6% of last season's games were blacked out and those occurred in just a few cities. So far this year, entering Week 13, no games have been blacked out. Thus, blackouts are rare, isolated, but necessary. We explained that the FCC's sports blackout rule supports and reinforces these broadcasting arrangements that benefit the public so greatly by ensuring that local fans -- without having to buy a pay-TV service -- can enjoy premier sports.

We stressed that the FCC's sports blackout rule, coupled with the network non-duplication and syndicated exclusivity rules, provide a necessary counterbalance to the compulsory copyright rule and that it would be unfair and unwise to get rid of these safeguards while maintaining the compulsory copyright. We also explained how the League's policy cannot be effectuated through private negotiations because the League lacks privity with local broadcasters and cable systems with respect to its over-the-air games. Lastly, we explained that the League recently incorporated changes to its ticketing policies designed to provide its member clubs additional options in engaging their fans and communities. The League regularly

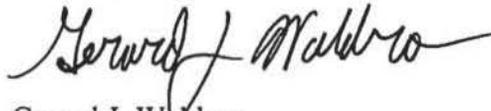
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reviews its practices in an effort to make the game more accessible to its fans and to enhance the stadium experience. This additional flexibility is consistent with the League's long-term commitment to promoting the live fan experience and to free, over-the-air broadcasting. These changes provide no basis for revision of the FCC's sports blackout rule.

Please direct any questions to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Gerard J. Waldron". The signature is fluid and cursive, with a long horizontal stroke at the end.

Gerard J. Waldron  
*Counsel to the National Football League*

cc: Ms. Maria Kirby