



The WALT DISNEY Company

Susan L. Fox
Vice President
Government Relations

December 20, 2013

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

Re: Applications of Comcast Corporation, General Electric Company, and NBCU
Universal, Inc. for Consent to Assign Licenses and Transfer Control of Licenses,
MB Docket No. 10-56

Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in
the 698-806 MHz Band, WT Docket No. 08-166

Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low
Power Auxiliary Stations, Including Wireless Microphones, and the Digital
Television Transition, WT Docket No. 08-167

Amendment of Parts 15, 74 and 90 of the Commission's Rules Regarding Low
Power Auxiliary Stations, Including Wireless Microphones, ET Docket No. 10-24

Notice of *Ex Parte* Communications

Dear Ms. Dortch:

On December 18, 2013, the following people met with Clint Odom, Policy Director for
Commissioner Jessica Rosenworcel: Ed Durso (EVP Administration), Richard Bates (SVP, The
Walt Disney Company), Susan Fox (VP, The Walt Disney Company) and Bill Bailey (VP, The
Walt Disney Company).



During this meeting, the Disney/ESPN representatives raised the stay of Media Bureau Order DA 12-1950 (dated December 4, 2012). The Order modified the Commission's decision granting its consent to the joint venture of Comcast Corporation and NBC Universal, Inc. ("C-NBCU") and would require an OVD to disclose peer programming contracts containing highly confidential information at the time when the OVD invokes the Benchmark Condition. The Disney/ESPN representatives stressed their previously-stated concern regarding the disclosure of highly confidential information to C-NBCU agents, and that exchanges of such highly confidential information are discouraged and prevented by competition and antitrust law.

During the same meeting, the Disney/ESPN representatives also stressed that the FCC needs to ensure that there is sufficient spectrum for wireless microphones, especially after the repacking process that will be conducted as part of the incentive auction process. As an illustration of ESPN's usage of wireless microphones, the Disney/ESPN representatives gave Mr. Odom a copy of the attached snapshot of ESPN's wireless microphone usage.

Sincerely,

A handwritten signature in purple ink, appearing to read "Susan L. Fox", written in a cursive style.

Susan L. Fox

cc: Clint Odom

WEEK IN THE LIFE OF ESPN

In 2012, ESPN televised approximately 3,200 events, of which 1,784 utilized wireless microphones, communications and talk back to talent.

The following is a conservative representation of one week of wireless utilization across all of the ESPN networks, nationwide.

The TV channel totals listed below are indicative of the available frequencies/channels coordinated in a given market.

Tuesday 11/06/2012:

1-College Football Game: **25** UHF Frequencies @ **2.604** MHz Total Bandwidth over **9** TV Channels.

Wednesday 11/07/2012:

1-College Football Game: **25** UHF Frequencies @ **2.604** MHz Total Bandwidth over **9** TV Channels.

2-NBA Games: **24** UHF Frequencies @ **2.352** MHz Total Bandwidth over **8** TV Channels.

Thursday 11/08/2012:

2-Studio Shows Veterans Day: **20** UHF Frequencies @ **2.160** MHz Total Bandwidth over **8** TV Channels.

2-College Football Games: **50** UHF Frequencies @ **5.208** MHz Total Bandwidth over **18** TV Channels.

1-Soccer Game: **7** UHF Frequencies @ **720** KHz Total Bandwidth over **3** TV Channels.

Friday 11/09/2012:

6-College Basketball Games: **36** UHF Frequencies @ **3.888** MHz Total Bandwidth over **18** TV Channels.

1-College Football Game: **25** UHF Frequencies @ **2.604** MHz Total Bandwidth over **9** TV Channels.

1-NBA Game: **12** UHF Frequencies @ **1.176** MHz Total Bandwidth over **4** TV Channels.

Saturday 11/10/2012

1-Studio Show Game Day: **20** UHF Frequencies @ **2.160** MHz Total Bandwidth over **8** Channels.

21-College Football Games: **525** UHF Frequencies @ **54.684** MHz Total Bandwidth over **189** TV Channels.

1-NASCAR Event: ESPN utilizes **one**, 6 MHz TV channel for communications. Due to the crowded spectrum in the UHF TV channels, ESPN, pursuant to an STA, utilizes frequencies in the 1.4 and 2.3 GHz bands to accommodate wireless microphone use.

Sunday 11/11/2012:

4-College Basketball Games: **100** UHF Frequencies @ **2.592** MHz Total Bandwidth over **36** TV Channels.

1-NASCAR Event: ESPN utilizes **one**, 6 MHz TV channel for communications. Due to the crowded spectrum in the UHF TV channels, ESPN, pursuant to an STA, utilizes frequencies in the 1.4 and 2.3 GHz bands to accommodate wireless microphone use.

1-NHRA Event: ESPN utilizes **one**, 6 MHz TV channel for communications. Due to the crowded spectrum in the UHF TV channels, ESPN, pursuant to an STA, utilizes frequencies in the 1.4 and 2.3 GHz bands to accommodate wireless microphone use.

1-Soccer Game: **7** UHF Frequencies @ **720** KHz Total Bandwidth over **3** TV Channels.

Monday 11/12/2012:

9-College Basketball Games: **54** UHF Frequencies @ **6.120** MHz Total Bandwidth across **27** TV Channels.

1-Studio Show NFL Game Day: **20** UHF Frequencies @ **2.160** MHz Total Bandwidth over **8** Channels.

1-Monday Night NFL: **40** UHF Frequencies @ **4.248** MHz Total Bandwidth over **12** TV Channels.

ESPN Studio Operations:

Bristol, CT:

245 UHF Frequencies @ **24.2** MHz Total Bandwidth over **31** TV Channels.

Los Angeles Studio Operations:

42 UHF Frequencies @ **3.320** MHz Total Bandwidth over **8** TV Channels.

Longhorn Studio Operations:

34 UHF Frequencies @ **3.384** MHz Total Bandwidth over **13** TV Channels.

Charlotte Studio Operations:

31 UHF Frequencies @ **3.072** MHz Total Bandwidth over **10** TV Channels.