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February 20, 2014

Via ECFS

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: Amendment of the Commission's Rules Related to Retransmission Consent, MB Docket No. 10-71; 2010 Quadrennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996, MB Docket No. 09-182

Dear Ms. Dortch:

On May 28, 2010, Cable America Missouri, filed an ex parte letter in the above referenced docket stating that our average carriage fee paid to separately owned, same market stations affiliated with Big 4 networks that coordinated their retransmission consent negotiations was 161% higher than our average fee paid to stations affiliated with Big 4 networks that did not engage in coordinated negotiations.<sup>1</sup>

At the time we filed our letter, we described our methodology as having included the examination of Big 4 stations that elected either retransmission consent or must carry.<sup>2</sup> In response to a recent inquiry concerning whether any of the Big 4 stations used in our analysis actually elected must carry, we reviewed our records. With this letter we clarify that in 2010 we included Big 4 stations that elected must carry in our calculation as paying a retransmission consent fee of zero. We believe this treatment of the data was appropriate. However, we conducted the calculation again including only Big 4 stations that elected retransmission consent and found that the average retransmission consent fee for Big 4 stations coordinating their retransmission consent negotiations was 30.5% higher than for separately negotiated stations.

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<sup>1</sup> Letter from Christopher A. Dyrek, Executive Vice President, Cable America Missouri LLC, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 10-71 (filed May 28, 2010).

<sup>2</sup> Id. at 1 n.1.

We also performed the same comparative analysis of fees paid using current data and found that the average retransmission consent fees we pay to Big 4 stations that elect retransmission consent and coordinate their retransmission consent negotiations are currently 18.7% higher than the average retransmission consent fees we pay for Big 4 stations electing retransmission consent that negotiate separately.

We request that this letter, which is being filed electronically, be placed in the file of the above-captioned proceeding.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Christopher A. Dyrek", is written over the typed name.

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