



June 13, 2014

*Via Electronic Filing*

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

Re: Notice of Ex Parte Communication: *Protecting and Promoting the Open Internet*, GN Docket No. 14-28; *Revision of the Commission's Program Access Rules*, MB Docket No. 12-68; *Video Device Competition, Implementation of Section 304 of the Telecommunications Act of 1996*, MB Docket No. 10-91

Dear Ms. Dortch:

On June 12, 2014, Milo Medin and I, of Google Inc. ("Google"), met with Gigi Sohn, Special Counsel for External Affairs to Chairman Wheeler. We discussed Google's continued support for a competitive environment that promotes innovation by broadband and video providers.

Mr. Medin discussed how Google Fiber's network has been designed to minimize buffering, allowing users to stream videos and browse the Internet without frustrating delays. Google Fiber also partners with content providers (such as YouTube, Netflix, and Akamai) to ensure efficient delivery of video by allowing them to peer directly to its network or to colocate their equipment at no charge in Google Fiber facilities. This allows for faster delivery of higher quality video. Google Fiber's approach does not involve any deals to prioritize its partners' video packets over others or otherwise discriminate among Internet traffic.

Mr. Medin also highlighted the difficulties that new multichannel video programming distributors ("MVPDs") face in gaining access to programming. He noted that these new entrants do not have enough subscribers to obtain volume discounts, and otherwise lack the negotiating power of the largest providers. Thus, they must pay dramatically more for programming than the major incumbent cable operators pay.

Finally, Mr. Medin encouraged the Commission to promote a competitive marketplace for retail consumer navigation devices as directed by Section 629 of the Communications Act, 47 U.S.C. § 549. The past decade has witnessed a proliferation of options for viewing video on PCs, tablets, and smartphones. However, there has been no similar explosion of innovation in navigation devices. Further, Mr. Medin explained that new and small MVPDs suffer from the lack of equipment options because they lack a sufficient number of subscribers to interest manufacturers in developing custom devices for their systems. Thus, to provide its TV customers with a better service, Google Fiber developed its own set-top equipment, which customers buy and own without open-ended lease payments.

Google Inc. Ex Parte  
Dkts. 14-28, 12-68, and 10-91  
June 13, 2014

Pursuant to the Commission's rules, this notice is being filed in the above-referenced dockets for inclusion in the public record. Please contact me should you have any questions.

Respectfully submitted,

A handwritten signature in blue ink that reads "Johanna Shelton". The signature is written in a cursive, flowing style.

Johanna Shelton  
*Director, Public Policy & Govt Relations*  
*Google Inc.*

cc: *Via Electronic Mail*  
Gigi Sohn