

July 18, 2014

BY ELECTRONIC FILING

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

Re: Notice of *Ex Parte* Communication in MD Docket Nos. 14-92, 13-140, 12-201

Dear Ms. Dortch:

On July 17, 2014, representatives of DIRECTV, LLC and DISH Network L.L.C. met with members of the Commission's staff to discuss regulatory fees. Present at the meeting were Stacy Fuller of DIRECTV; Michael Nilsson, outside counsel to DIRECTV; Alison Minea of DISH; Thomas Buckley and Roland Helvajian of the Office of Managing Director; and Mika Savir of the Enforcement Bureau.

We urged the Commission not to amend its Schedule of Regulatory Fees to treat Direct Broadcast Satellite operators like cable operators, and reviewed the comments we filed in this proceeding on July 7. As set forth in more detail therein:

- The Commission lacks legal authority to engage in such a "permitted amendment" under the Communications Act, and cannot justify such action under the Administrative Procedure Act.
- DBS operators have never generated, and do not generate now, anything approaching the regulatory costs that cable operators do.
- Adopting this proposal would raise any other number of logistical and implementation concerns, none of which have been sufficiently considered.

HARRIS, WILTSHIRE & GRANNIS LLP

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Pursuant to 47 C.F.R. § 1.1206(b)(2), I am filing one copy of this letter electronically in each of the docket lists listed above.

Respectfully submitted,

/s/
Michael Nilsson
Counsel for DIRECTV, LLC

cc: Thomas Buckley
Roland Helvajian
Mika Savir