



September 16, 2014

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Communication, MB Docket Nos. 12-3 and 10-71

Dear Ms. Dortch:

On Monday, September 15, 2014, Jane Mago, Executive Vice President and General Counsel and the undersigned of the National Association of Broadcasters (NAB) met with Commissioner Ajit Pai and his Chief of Staff Matthew Berry and separately with Clint Odom, Policy Director in the Office of Commissioner Jessica Rosenworcel, to discuss the sports blackout rules, which the Commission has proposed to eliminate, and other program exclusivity rules.

NAB urged the offices to be aware of public misunderstanding and unintended consequences likely to follow repeal of the FCC sports blackout rules. In addition, they emphasized the continuing need for other exclusivity rules, including the network non-duplication rules and the syndicated exclusivity rules. These other exclusivity rules implicate a much larger portion of broadcast programming, and their elimination could substantially undermine the economic foundation that supports localism. For a host of reasons, including the counterbalancing effect of the compulsory copyright license that allows cable systems to bypass arms-length negotiations with certain copyright holders, eliminating the other exclusivity rules would not be in the public interest.

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Respectfully submitted,

A handwritten signature in black ink that reads "Scott Goodwin". The signature is written in a cursive, flowing style with a prominent initial "S".

Scott Goodwin
Associate General Counsel
National Association of Broadcasters

CC: Matthew Berry
Clint Odom