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EX PARTE

September 22, 2014

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

Re: Petition for Rulemaking filed by the Campaign Legal Center, Common Cause and The Sunlight Foundation Seeking Expansion of Online Public File Obligations to Cable and Satellite TV Operators; MB Docket No. 14-127

Dear Ms. Dortch:

On September 18, 2014, Stephanie Podey, Vice President and Associate General Counsel, and I, of the National Cable & Telecommunications Association, met with the following staff of the Media Bureau: Robert Baker, Hope Cooper, John Kiefer, Kim Matthews, Wayne McKee, Mary Beth Murphy, Alison Neplokh, Jeffrey Neumann, Holly Saurer, Sarah Whitesell, and John Wong to discuss NCTA's written comments in the above-referenced proceeding.

Consistent with those comments, we explained that if the Commission were to decide to issue a Notice of Proposed Rulemaking ("NPRM") in this proceeding, it should examine how to tailor any proposed online posting rules to the specific public inspection file obligations of cable operators and how to structure any proposed database in a way that makes sense both for cable operators and consumers.¹

We explained that any NPRM also should explore how to avoid imposing undue burdens on cable operators.² We proposed that any NPRM should consider how to avoid requirements to upload voluminous files of little (if any) interest to the general public,³ and should look at ways of accommodating existing electronic file approaches.⁴

¹ See NCTA Comments at 2-4. We discussed that, in contrast to broadcast, few elements of a cable system's public file are electronically filed with the Commission. *Id.* at 5. Moreover, there are a large number of cable systems overall (currently over 5200), each with a public inspection file. *Id.* at 3. On a designated market area ("DMA") basis, there may be multiple systems per DMA served by a single cable operator. *Id.* at 3-4.

² See *id.* at 5-6; NCTA Reply Comments at 2.

³ See NCTA Comments at 5, 7.

⁴ For example, the Commission should explore how it can preserve electronic political files that have been created by some cable operators. See *id.* at 4-5.

Finally, we proposed that any upcoming proceeding should be used as an opportunity to streamline and modernize the cable public inspection file rules.⁵

Respectfully submitted,

/s/ Diane B. Burstein

Diane B. Burstein

cc: Robert Baker
Hope Cooper
John Kiefer
Kim Matthews
Wayne McKee
Mary Beth Murphy
Alison Neplokh
Jeffrey Neumann
Holly Saurer
Sarah Whitesell
John Wong

⁵ See NCTA Comments at 6-8.