August 14, 2015

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

RE: Notice of Ex Parte Communications Amendment to the Commission’s Rules Related to Retransmission Consent, MB Docket No. 10-71

Dear Ms. Dortch:

On August 13, 2015, Susan Fox (Vice President, Government Relations, The Walt Disney Company) and Dave Davis (President and General Manager, WABC) met with the following individuals in five separate meetings: (1) Media Bureau: Mary Beth Murphy (Chief, Policy Division), Nancy Murphy (Associate Chief), Kathy Berthot (Attorney Advisor, Policy Division), Steven Broeckaert (Senior Deputy Division Chief, Policy Division), Raelynn Remy (Attorney Advisor, Policy Division); (2) Matthew Berry (Chief of Staff, Office of Commissioner Pai) and Alison Nemeth (Legal Advisor, Office of Commissioner Pai); (3) Maria Kirby (Legal Advisor, Office of the Chairman); (4) Robin Colwell (Chief of Staff, Office of Commissioner O’Rielly); and (5) Valery Galasso (Policy Advisor, Office of Commissioner Rosenworcel). Susan Fox also had a very short telephone conversation with Chanelle Hardy (Chief of Staff, Office of Commissioner Clyburn) on August 12, 2015 on the same subjects.

During the meetings, Ms. Fox and Mr. Davis addressed the following subjects: (1) an update on WABC’s continuing work to improve its broadcast facilities and redundancy as well as an update on WABC’s and ABC’s digital products; (2) a recollection of the recent history of successful retransmission consent negotiations for WABC and the ABC Owned Television Stations, including carriage negotiations for the ABC Owned Stations with both larger and smaller MVPDs.

With respect to the network non-duplication rules, Ms. Fox and Mr. Davis briefly reiterated their concern with respect to the potential repeal of the network non-duplication rules, including the difficulty of enforcement of private contractual rights given the existence of the compulsory license and the efficiency of the enforcement mechanisms set forth in the FCC’s rules. They also stressed the importance of the FCC clarifying the continuing impact and legality of mutually-agreed-upon existing contractual provisions between broadcast networks and affiliates.
This letter is being submitted electronically in the above-referenced docket, which has been granted permit-but-disclose status, pursuant to Section 1.1206(b) of the Commission’s Rules. Should you have any questions concerning this submission, kindly contact the undersigned.

Respectfully submitted,

/s/
Susan L. Fox

cc: Mary Beth Murphy
Nancy Murphy
Kathy Berthot
Steven Broeckaert
Raelynn Remy
Matthew Berry
Alison Nemeth
Maria Kirby
Robin Colwell
Valery Galasso
Chanelle Hardy