Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC  20554  

In the Matter of  
Amendment of Section 73.1216 of the  
Commission’s Rules Related to Broadcast  
Licensee-Conducted Contests  
MB Docket No. 14-226  
RM-11684  

COMMENTS OF  
THE NATIONAL ASSOCIATION OF BROADCASTERS  

Molly M. O’Connor  
Legal Intern  

Rick Kaplan  
Jerianne Timmerman  
Ann West Bobeck  
Justin L. Faulb  

February 18, 2015
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COMMENTS OF
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I. INTRODUCTION AND SUMMARY

The National Association of Broadcasters (NAB)\(^1\) submits these comments in support of the Federal Communications Commission’s (FCC or Commission) Notice of Proposed Rulemaking\(^2\) to modernize its regulations on contests conducted by broadcast radio and television stations. The Commission’s proposal to update its contest rules accurately reflects how today’s consumers access information. Listeners and viewers will benefit from online disclosure of the material terms of licensee-conducted contests, which will largely replace the current practice of fleeting and rapidly communicated on-air announcements. Broadcasters will be able to better serve their listeners and viewers, providing more meaningful opportunities for them to access and understand the disclosed information. Moreover, in light of the fact that the Commission applies its

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\(^1\) NAB is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the FCC and other federal agencies, and the courts.

\(^2\) Amendment of Section 73.1216 of the Commission’s Rules Related to Broadcast Licensee-Conducted Contests, Notice of Proposed Rulemaking, 29 FCC Rcd 14185 (Nov. 21, 2014) (NPRM).
contest rules only to over-the-air radio and television broadcasters – and not to contests conducted by satellite or Internet radio, cable and satellite television or over commercial wireless networks – adoption of the FCC’s proposal will be an important step towards bringing broadcasters into regulatory parity with their competitors.

II. THE FCC SHOULD MODERNIZE ITS CONTEST RULES TO BENEFIT CONSUMERS AND REDUCE REGULATORY BURDENS

A. TECHNOLOGICAL CHANGES HAVE ENHANCED BROADCASTERS’ ABILITY TO INFORM CONSUMERS AND BETTER SERVE THE PUBLIC INTEREST

The FCC adopted its current contest rule in 1976. At that time, broadcasters had only two possible avenues to distribute information to consumers: over-the-air and via hard copy made available at the licensee’s place of business. Times undoubtedly have changed. As the Commission itself noted, there have been “dramatic changes in the way that consumers access information since the Contest Rule was adopted.”3 Among other developments, the Internet has added a critical third avenue to easily connect with, and inform, consumers.4 The Commission has recognized that the Internet is, specifically, “an effective tool for distributing information to broadcast audiences.”5

Consumers today expect to communicate with any kind of commercial enterprise via the Internet. Nearly every advertisement – on any medium – directs consumers to the advertiser’s website or app. Eighty-one percent of Americans online report that their

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3 NPRM, ¶ 9.

4 According to a recent report by the Pew Research Center, 87 percent of online adults “say the internet and cell phones have improved their ability to learn new things,” including 53 percent “who say it has improved this ‘a lot.’” Kristen Purcell, Americans Feel Better Informed Thanks to the Internet, Pew Research Center, Internet, Science & Tech (Dec. 8, 2014) (Pew Report).

5 NPRM, ¶ 9 (citing Standardized and Enhanced Disclosure Requirements for Television Broadcast Licensee Public Interest Obligations, Second Report and Order, 27 FCC Rcd 4535, ¶ 10 (2012)).
Internet and mobile phone use "has made them better informed about products and services today than they were five years ago." One of the Internet's great advances has been to open a direct line of communication for important information between consumers and businesses and between consumers and media outlets. Consumers are familiar with local broadcast stations' websites and visit them frequently.

The Internet has opened up new ways for broadcasters and their listeners and viewers to communicate about contests specifically. The record in this proceeding demonstrates that many licensees already "use their websites to post contest-related information." In addition, many popular syndicated programs, such as The Steve Harvey Show, Live with Kelly and Michael and The Bob & Tom Show all post contest rules online. Allowing broadcasters to disclose licensee-conducted contest rules online comports with current practice for syndicated programming and meets consumer expectations about how and where to obtain contest information.

Paving the way for online distribution of information also will help the FCC meet the goals of its contest rules. As the record indicates, contest rules can often be lengthy and detailed. The current rules that de facto require a rapid recitation of the material

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7 See, e.g., How Americans Get Their News, American Press Institute (Mar. 17, 2014) (whether from the TV broadcast or the station's website, 93 percent of Americans say they used a TV news operation as source of news in the last week).

8 NPRM, ¶ 9.

terms on-air can make contest terms difficult for consumers to comprehend. Allowing broadcasters to inform listeners and viewers by posting contest information online will permit consumers to carefully read and better understand the material terms of contests. Listeners and viewers can also easily miss periodic on-air disclosure of material terms. In contrast, online disclosures are always available to consumers, and may be accessed via an increasing variety of devices, including mobile phones and tablets.10

Even those listeners and viewers uninterested in contests will benefit from the shift to online disclosure. Current contest rule announcements can annoy consumers, particularly those not interested in participating in any given contest. These announcements interrupt programming the broadcasters have otherwise carefully prepared, and may even encourage “some in the audience” to “turn to another channel or station during these disclosures.”11 The proposed rules will help make the broadcast experience better meet consumer preferences and expectations.

B. MANY OF THE FCC’S CURRENT CONTEST RULES APPLICABLE TO ON-AIR DISCLOSURES WILL TRANSLATE EASILY TO THE ONLINE CONTEXT

While the Commission is proposing a shift in where contest rule disclosures are made, there is no reason to alter the substance of the current rules.12 Many of the

10 In 2014, an estimated 160 million Americans ages 12 and older owned smartphones, an over 500 percent increase in the past five years. Smartphone penetration in 2014 approached 75 percent of those under age 55, and nearly 40 percent of Americans ages 12 and older owned a tablet. More than half owned a television connected to the Internet. Edison Research and Triton Digital, The Infinite Dial 2014, available at http://www.edisonresearch.com/the-infinite-dial-2014/

11 NPRM, Statement of Commissioner Michael O’Rielly.

12 NAB does not mean to suggest here that the broadcast contest rules as a whole are still necessary to serve the public interest. Rather, if the Commission believes it necessary to retain the contest rules, then there is no reason to change the substance of most of those rules in the context of online disclosures.
elements of the FCC’s long-standing rules can easily be imported into the online environment.

First, the Commission should continue to refrain from prescribing any particular format for the disclosures.\(^\text{13}\) As should be evident, neither broadcasters, their websites nor their contests are “one size fits all.” Fishing contests differ significantly from trivia contests, and a contest for a car, concert or Super Bowl tickets, or a cash prize will have distinctly different material terms. Given the wide variety of contests, a rigid standardized disclosure format could restrict broadcasters in ways that hamper their ability to communicate important information to consumers in the clearest manner. Due to the varying nature of contests and those who conduct them, NAB urges the FCC to continue to provide broadcasters with appropriate flexibility to implement updated contest regulations in ways tailored to meet the needs of their listeners and viewers.

A newly specified disclosure format is also wholly unnecessary. Nothing about the change from on-air to online disclosures suggests that a standardized format is now essential. If anything, there would appear to be less need for strict standardization in the online environment, given licensees’ enhanced ability to communicate contest details online. Broadcasters are, in any event, incentivized to fully disclose all material terms.\(^\text{14}\)

\(^{13}\) NPRM, ¶ 10.

\(^{14}\) Broadcasters obviously want viewers and listeners to enter contests. If online disclosure are unclear or inadequate, consumers may not even know how to enter or, at the least, will be reluctant to enter contests they do not understand. In addition, states regulate contests extensively, and broadcasters conducting contests must comply with myriad state laws about disclosing the terms of contests.
Second, NAB recommends that the FCC should not specify, for the first time, the duration that material contest terms must remain available.\footnote{See NPRM, ¶ 11 (asking how long a licensee should be required to maintain contest information on a website).} As the Commission recognizes in its current on-air rules, contests vary in duration, so a specific length of time for making disclosures is impractical. Most notably, broadcasters should be permitted to remove contest terms from their websites as soon as a contest ends to avoid consumer confusion. Ensuring that consumers are not mislead by viewing material terms for expired contests is also consistent with state contest laws.

Third, the record in this proceeding does not support a change in the definition of material terms.\footnote{NPRM, ¶ 12.} The current standard has worked for nearly 40 years without any meaningful challenges. The Commission has correctly recognized that “material terms may vary widely depending upon the exact nature of the contest.”\footnote{47 C.F.R. § 73.1216, note 1(b).} Thus, a “one size fits all” mandate to disclose particular terms would be unlikely to “fit” many contests. In addition, altering the current definition of “material terms” to require numerous, boilerplate disclosures would run the risk of making contest terms resemble the lengthy website privacy statements that consumers routinely ignore. Such an outcome would not serve the interests of those entering broadcast contests.

Fourth, NAB supports the transparent and accessible online disclosure of material contest terms and strongly agrees that the broadcasters must periodically identify where

\footnote{15 See NPRM, ¶ 11 (asking how long a licensee should be required to maintain contest information on a website).}
\footnote{16 NPRM, ¶ 12.}
\footnote{17 47 C.F.R. § 73.1216, note 1(b).}
material terms can be located.\textsuperscript{18} A shift to online disclosure, however, should not lead the Commission to now require stations to “broadcast the website address where contest terms are available \textit{each time they mention or advertise} a contest.”\textsuperscript{19} On-air talent may “mention” a contest multiple times each hour in passing, as a lead-in to a song or television program, or in conversation with a co-host. For example, a DJ may remind listeners to tune-in during the next hour for a chance to win concert tickets in the few seconds leading into a hit song, like \textit{Shake It Off}. As a result, broadcasters could be required to air website addresses dozens of times per day or hundreds of times per week. NAB suggests a better solution would be to require broadcasters to announce, periodically, the pertinent address with sufficient information for the consumer to easily find the material contest terms online.

Fifth, NAB supports allowing broadcasters to continue to disclose material contest terms over-the-air, if they choose.\textsuperscript{20} For some contests with uncomplicated terms, traditional on-air disclosure may be appropriate, and the smallest broadcasters, particularly, should have the flexibility to provide disclosures either on-air or online.

\textbf{C. NEW ISSUES ASSOCIATED WITH MOVING CONTEST DISCLOSURES ONLINE CAN BE RESOLVED CONSISTENT WITH THE APPROACH OF THE CURRENT RULES}

The proposal to move contest disclosures online raises a few novel issues that the Commission’s rules for on-air disclosures do not address. NAB strongly believes that

\begin{itemize}
\item \textsuperscript{18} Under the FCC’s current rules, the material terms of contests “should be disclosed periodically.” The exact frequency of these disclosures is not specified, but disclosure “in a reasonable number of announcements is sufficient.” 47 C.F.R. § 73.1216, note 2.
\item \textsuperscript{19} NPRM, ¶ 13 (emphasis added).
\item \textsuperscript{20} NPRM, ¶ 14.
\end{itemize}
these issues are best resolved by remaining consistent with how the current rules treat similar issues.

Most notably, the Commission inquires whether there should be a specific place on broadcasters’ websites where contest rules must be disclosed.\(^{21}\) While NAB agrees with the Commission that material contest terms must be easily accessible online, we urge the FCC to refrain from dictating specific locations on a licensee’s website. The layout of each station’s website is different, and what may work well for one broadcaster’s website may not be practical or appropriate for another. The Commission’s lodestar should be ensuring that consumers have ready access to contest terms, rather than mandating one specific location for all broadcasters’ websites.\(^{22}\)

The Commission also must decide how broadcasters should identify website locations on-air. NAB recommends that stations announce the website where material contest terms can be found in a manner that clearly indicates its location. For example, station KXYK could announce that “detailed information is available at KXYK.com/contests,” or “more information on KXYK’s webpage under the contests tab.” Announcements such as these provide clear and sufficient direction for consumers and easily lend themselves to frequent on-air references.

The Commission should refrain from requiring licensees to announce the “complete, direct website address where the contest terms are posted.”\(^{23}\) Specifying complete web addresses would be jarring for consumers and eliminate some of the

\(^{21}\) NPRM, ¶ 11.

\(^{22}\) See 47 C.F.R. § 73.1216, note 2 (“manner of disclosure of the material terms of a contest are within the licensee’s discretion”).

\(^{23}\) NPRM, ¶ 13 (emphasis added).
benefits that would otherwise be realized by moving disclosures online. It would also be overly burdensome to on-air talent and may discourage frequent references to contests, or even lead to fewer stations adopting online disclosures. Consumers simply do not expect to hear, and could be more confused by, an entire Web address, such as “visit h-t-t-p colon backlash backslash w-w-w dot k-x-y-k dot com backslash contest backslash terms.”

If the goal is to empower consumers, the Commission must allow broadcasters to provide the simplest and clearest identifying information so that the average listener or viewer can easily locate the pertinent Web page.

III. THE FCC’S REVIEW MUST TAKE INTO ACCOUNT THAT ITS CONTEST RULES APPLY ONLY TO BROADCAST RADIO AND TELEVISION AND NOT TO COMPETING PLATFORMS WITHIN ITS JURISDICTION

NAB sincerely appreciates the Commission’s recognition of the need to modernize the licensee-conducted contest rule. The sheer advances in technology alone make the proposed changes essential. But it is also critical for the Commission to affirmatively acknowledge that these rules currently only apply to broadcasters, and not to any other competitive platforms, including satellite or streaming radio, cable or satellite television or wireless services. These types of disparately-applied rules handicap broadcasters as they compete for consumer acceptance with other services with lesser regulatory burdens.

When the FCC adopted its contest rules in 1976, ARAPNET, the precursor to the Internet, had only recently developed. The electronic media available to consumers consisted of three major television broadcast networks and broadcast radio. It is a vast

24 As an example from the FCC’s website, it would be burdensome for FCC staff to direct consumers to “http://transition.fcc.gov/eb/broadcast/contests.html” every time it received a question. Specific website address are often quite confusing (e.g., most consumers would not expect “transition” to be required before “FCC.gov”).
understatement to observe this is no longer the relevant media and telecommunications landscape. Broadcasters now compete with cable and satellite television, satellite radio, and the Internet for consumers’ and advertisers’ time and attention. The FCC is well aware of the growth of subscription television,\(^{25}\) subscription and streaming radio,\(^{26}\) and the Internet.\(^ {27}\) Indeed, Chairman Wheeler in this proceeding stated that “[a]ccess to the Internet is more ubiquitous than access to television.”\(^{28}\) Despite the ubiquity of online and multichannel video and audio competitors, the FCC imposes specific contest rules only upon broadcasters – even though these competitors frequently conduct contests.\(^ {29}\)

As the Commission has previously observed in a variety of contexts, competing services should have regulatory parity.\(^ {30}\) Giving broadcasters additional flexibility to meet


\(^{27}\) According to the FCC, 94 percent of Americans are technically capable of connecting to residential Internet service sufficient to support streaming or downloading of video programming. Report, GN Docket No. 11-121, 27 FCC Rcd 10342, 10369 (2012). A 2014 report found that 87 percent of American adults use the Internet, and 97 percent of young adults (ages 18-29) do so. The Web at 25 in the U.S., Report, Pew Research Center, at 5 (Feb. 27, 2014).

\(^{28}\) NPRM, Statement of Chairman Tom Wheeler.

\(^{29}\) See Appendix A (providing examples of contests by other competitors).

\(^{30}\) See, e.g., Basic Service Tier Encryption and Compatibility Between Cable Systems and Consumer Electronics Equipment, Report and Order, 27 FCC Rcd 12786, ¶ 8 (2012) (“In addition, encryption will . . . establish regulatory parity between cable operators and their satellite competitors”); Amendment of the Commission’s Rules Related to Retransmission Consent, Notice of Proposed Rulemaking, 26 FCC Rcd 2718, ¶ 41 (2011) (“Accordingly, to achieve regulatory parity between cable systems and other MVPDs, we seek comment. . . .”).
the current contest rule can at least start to reduce the gulf that currently exists between how broadcasters and other media and telecommunications services are regulated in this area. Broadcasters merely seek to provide a competitive public service to their listeners and viewers, and providing flexibility in this context can begin the process of making broadcast regulation more level with the regulation of services against whom local stations compete on a daily basis.

IV. CONCLUSION

NAB strongly supports the Commission’s proposal to modernize its licensee-conducted contest rules. Consumers will clearly benefit from broadcasters utilizing the Internet to provide disclosure of the material terms of station contests. Broadcasters will be able to find new and innovative ways to hold contests and to inform viewers about their material terms. Moreover, given the disparity in regulation in this area between broadcasters and all other media and telecommunications mediums, fundamental fairness and competition will be well served by starting to reduce the unnecessary burdens that hamper growth and innovation in broadcast radio and television.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS

1771 N Street, NW
Washington, D.C. 20036
(202) 429-5430

Rick Kaplan
Molly M. O’Connor
Jerianne Timmerman
Ann West Bobeck
Justin L. Faulb

February 18, 2015
Appendix A

Contests by Broadcast Competitors
Below you will see all the contests and promotions from Charter for your area. Just select the contest of your choice and click on the banner. Then, follow the simple instructions to register to win online at the bottom of that page. You will see the official contest rules on the bottom of each page. Do you feel lucky? Choose your contest now and get ready to Win with Charter!

There are no promotions running at this time in your area. Check back often as we are always adding new promotions so you can Win With Charter!

**Half Price Gift Certificates**

If you are located in Wisconsin, Minnesota, Nebraska, or Michigan visit CharterMainStreet for half price gift certificates to your favorite restaurants, spa/salons, golf courses, events and more! These make ideal gifts for family, friends...even yourself! Log on to CharterMainStreet.com each week to find half price gift certificates for businesses in your area.
Welcome to Win with Charter

If you are in an eligible Charter coverage area you will be able to view the contests and promotions that are available in your area, select which contest or promotion you would like to enter and register for a chance to win with Charter. Not all Charter coverage areas will have promotions or contests listed at all times. Please keep checking back for promotions sponsored by local retailers in your area.
FEATURED SWEEPSTAKES.

Trip for two to Hawaii!
Entry Period: Tue, 12/1/14 – Tue, 12/31/14
Winners Announced: Thu, 1/15/15
Grand prize (1 total)
+ Trip for two to Hawaii, plus $500 to get pampered in the Royal Hawaiian Hotel spa.
+ Estimated Value: $5,000
First Prize (31 total)
+ $250 AMEX Gift Card
+ Bose Soundlink Bluetooth Speaker
+ Keurig 1-cup mini brewer
+ Amazon Kindle Paperwhite
+ And more!

Enter Now
Total Sweepstakes Value: $10,000.00

OTHER SWEEPSTAKES.

Celeb-style trip for two to Napa Valley!
Enter period: Tue, 12/16/14 – Tue, 1/13/15
Winners Announced: Thu, 1/20/15
Grand Prize (1 total)
+ Trip for two to Napa Valley, including airfare, luxury accommodations and a trip to a vineyard.
+ Estimated value: $4,000.00
First Prize (10 total)
+ Restaurant.com gift cards
+ 1-800-Flowers gift cards
+ Estimated value: $50.00 each

Enter Now
Total Sweepstakes Value: $5,000.00

Enter daily from now until 11:59PM on December 31, 2014. Open to legal residents in the US and DC who are at least 18 and DISH customers. No purchase necessary to enter or win. Void where prohibited.

http://www.mydish.com/perks/sweepstakes/
## RECENT SWEEPSTAKES WINNERS.

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<td>Jonathan S.</td>
<td>Hermon</td>
</tr>
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*By participating in any DISH Sweepstakes, you authorize DISH to publish your name on our winner’s page.*
Win a Trip to Orlando
Tune into any Boston Celtics game on the Comcast SportsNet before January 4th, 2015 and watch for the Orlando Sweepstakes keyword.

The Tedy Contest
One New England favorite deserves another. Visit any Papa Gino’s restaurant, take a selfie with Tedy Bruschi and post your photo on Papa Gino’s Facebook page. You could win Patriots tickets, lunch with Tedy and other amazing prizes. Hurry! Contest ends 10/19/14 #TedySelfie...
OFFICIAL RULES

INNOVATIONS 4 ENTREPRENEURS CONTEST

NO PURCHASE OR PAYMENT OF ANY KIND IS NECESSARY TO ENTER OR WIN THIS CONTEST. A PURCHASE WILL NOT INCREASE YOUR CHANCES OF WINNING. ENTRY IS OPEN TO LEGAL RESIDENTS OF THE 50 UNITED STATES OR THE DISTRICT OF COLUMBIA WHO ARE AT LEAST 18 YEARS OF AGE OR AGE OF MAJORITY, WHICHEVER IS OLDER, WHO OWN AND OPERATE AN INDEPENDENT NONFRANCHISED BUSINESS LOCATED IN 1 OF 16 COMCAST SERVICE AREAS IN THE UNITED STATES.

1. Contest Dates: The Innovations 4 Entrepreneurs Contest ("Contest") begins February 26, 2014 at 12:00:01 AM Eastern Time ("ET"), and ends July 3, 2014 at 11:59:59 PM ET ("Contest Period"). During the Contest Period there are a series of events which start and end on or about the dates and times noted below.

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<tr>
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<td>SPONSOR SELECTION</td>
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<td>REGIONAL WINNERS ALTERNATE</td>
<td>May 12</td>
<td>May 18</td>
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<tr>
<td>GRAND PRIZE WINNERS</td>
<td>June 26</td>
<td></td>
</tr>
</tbody>
</table>

Note: All dates/times are 2014 Eastern Time


XFINITY®

FALL TV SWEEPSTAKES

Catch Up on TV’s Hottest Shows and Enter for a Chance to WIN Big!

XFINITY® SWEEPSTAKES RULES

Sweepstakes is conducted in English (which will be given its everyday ordinary meaning), except where prohibited by law, as a condition of participating in the Sweepstakes, participants agree that (1) any and all disputes and claims of action arising out of or in connection with this Sweepstakes, or the prizes awarded, shall be resolved individually, without resort to any form of class action, and entered by final binding arbitration under the rules of the American Arbitration Association and held in this A.A. region office nearest the participant; (2) the Federal Arbitration Act shall govern the interpretation, enforcement and all proceedings at such arbitration; and (3) judgment on any such arbitration award may be entered in any court having jurisdiction, without preclusion hereof and participant shall be permitted to obtain awards; and, participant hereby waives all rights to claims, punitive, incidental, or consequential damages, to any other damages, including attorneys’ fees, other than participant’s actual out-of-pocket expenses (if any), costs associated with participating in this Sweepstakes, and participant further waives all rights to have damages multiplied or increased. All unresolved disputes concerning the construction, validity, interpretation and enforceability of these Official Rules, or the rights and obligations of participant and Sponsor in connection with the Sweepstakes, shall be governed by, and construed in accordance with, the substantive laws of the Commonwealth of Pennsylvania.

3. LIST OF WINNERS: For the names of the Winners, available after December 31, 2014, send a self-addressed, stamped envelope for receipt by January 30, 2015 to: XFINITY FALL TV Sweepstakes Winners, P.O. Box 13799, Bridgewater, CT 06757-9991. Residents of Vermont may omit return postage.
Charter gives you the **MOST HDTV, FASTEST INTERNET** and **BEST VOICE FEATURES**

**CONGRATS TO OUR WINNERS!**

Thank you for your interest in Major You, but the sweepstakes is now over.

You can still shop our best online offers!

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$**29.99*/mo—EACH—for 12 mos when bundled**

LEARN MORE
We have a secret

We're about to launch an amazing new HTC device

We're giving away one device a day for 5 days, March 21-25.

ENTER FOR A CHANCE TO WIN

Sign up with your name and email.

First Name

Last Name

Email Address

[ ] Yes, enter me in the sweepstakes to win!
I have read and agree to the Official Rules, Terms of Use and AT&T privacy policy and am at least the age of majority.

[ ] Yes, sign me up for the latest products and services from AT&T and to be notified when the device is revealed!
I agree to receive an email when this device is revealed even if I unsubscribe from AT&T marketing messages.

Enter Now

Share the secret for additional entries

Enter and share the sweepstakes and receive one additional entry for every three friends that visit this sweepstakes site.

1 No purchase necessary. The Sweepstakes is open to legal residents of the 50 United States and District of Columbia who are age of majority. Ends 11:59 p.m. ET, March 25, 2014. Limit one entry per person/email per day. Opportunity for additional entries available. Void where prohibited. For full details, see complete rules.
SiriusXM Radio is giving our subscribers the chance to win an opportunity to go Arizona for the BIGGEST game of the season – Super Bowl XLIX!

Only the best teams get to play in the sports most prestigious match-up and you could be there to witness history!

One Grand Prize winner will receive round-trip flights for two to Arizona, three nights hotel stay and plane tickets to Super Bowl XLIX on February 1, 2015. If you’re a football fan, this is the ultimate prize! Enter for your chance to win below:

TELL US WHAT YOU LIKE AND GET MORE OF WHAT YOU WANT. When you respond, tell us your favorite SiriusXM channels, so we can tell you about more exclusive audio and offers – including invitations to private SiriusXM events, free tickets to concerts, movie screenings and sporting events, and much more!

NO PURCHASE NECESSARY TO ENTER. A purchase will not increase your chances of winning. Void where prohibited. JJD, LLC, SIRIUS XM RADIO INC. and SiriusXM subscribers part of an introductory trial will be entered two times per week in the Sweepstakes. The trial will begin December 18, 2014 and will expire January 31, 2015. No purchase necessary. Void where prohibited, taxed or restricted. For details visit siriusxm.com.

Personal Directtm Player access will be verified for eligibility. ENTER online only from 2:00 PM ET on December 18, 2014 until 11:59 PM ET on January 31, 2015. See Official Rules for completely valid entry eligibility and winner agreement.

The N, Entries are defined in the Official Rules. SiriusXM is not responsible for any transmissions errors.

* Subscriber Name
* Subscriber Last Name
* Address
* Account ID