

September 11, 2014

The Honorable John D. Rockefeller IV
Chairman
Committee on Commerce, Science
and Transportation
United States Senate
Washington, DC 20510

The Honorable John Thune
Ranking Member
Committee on Commerce, Science
and Transportation
United States Senate
Washington, DC 20510

Dear Chairman Rockefeller and Ranking Member Thune:

On behalf of more than six-hundred local television broadcast stations that are affiliated with the ABC, CBS, NBC, and Fox television networks and which serve communities across the country, we write to express concern with the draft Satellite Television Access and Viewer Rights Act ("STAVRA") circulated by your offices last week.

While we appreciate your recent announcement that the "Local Choice" proposal will no longer be considered in this STAVRA legislation, the current draft still includes several highly controversial provisions that would undermine *free* access by your constituents and the nation's television viewers to high quality national network and local broadcast television programming.

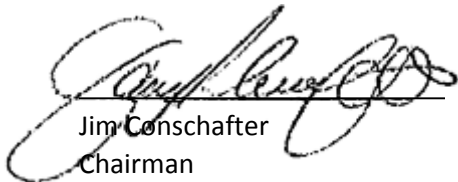
Most troubling is the provision that grants the FCC new authority over several aspects of the broadcast business which no clear record exists to support, and does so without extending that same regulatory authority to cable and satellite companies with whom local stations compete. We think a fundamental principle that should guide Congress's review of this area is that both sides of the retransmission consent process should be treated symmetrically; obligations or limitations should not be imposed on either the broadcaster or MVPD alone. The bill violates this principle by imposing negotiation limitations on broadcasters while allowing the largest cable companies in the country to engage in *the exact same behavior*.

The draft bill also is problematic because it asserts unprecedented extension of FCC regulatory authority over private marketplace negotiations, a step that is contrary to the public interest since it would impede the ability of local broadcast stations to compete in a highly competitive video marketplace for popular national entertainment and sports programming. Singling out broadcasters and broadcasters, alone, for such enhanced regulatory treatment is patently unfair, discriminatory and anti-competitive, and it would create an even more uneven playing field between broadcasters and their principal competitors to the detriment of your constituents.

While even a straight renewal of the expiring satellite television laws provides no benefits to broadcasters and runs contrary to our fundamental copyright laws, the affiliates and the National Association of Broadcasters have not opposed the legislation. However, we urge the Committee to not use this vehicle to address extraneous issues that further undermine broadcasters' programming rights, particularly where some provisions in the STAVRA draft have been aired publicly for the first time only a few days ago. At a minimum, such significant policy changes should be subject to thoughtful discussion and consideration, rather than being rushed through the Committee process.

We would appreciate an opportunity to discuss your proposal in more detail, and we look forward to furnishing you and Members of the Committee additional information to assist in your renewal of the expiring satellite television laws.

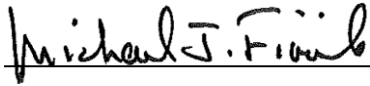
Sincerely,

A handwritten signature in black ink, appearing to read "Jim Conschafter", written over a horizontal line.

Jim Conschafter
Chairman
NBC Affiliates Board

A handwritten signature in black ink, appearing to read "Mike Devlin", written over a horizontal line.

Mike Devlin
Chairman
ABC Television Affiliates Board of Governors

A handwritten signature in black ink, appearing to read "Michael J. Fiorile", written over a horizontal line.

Michael Fiorile
Chairman
CBS Affiliates Board

A handwritten signature in black ink, appearing to read "Jeff Rosser", written over a horizontal line.

Jeff Rosser
Chairman
Fox Affiliate Board of Governors

CC: All Members of the Senate Commerce Committee