



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

Re: Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming; MB Docket No. 06-189

Dear Ms. Dortch:

The individuals listed below, along with myself, met as a group representing the Board of Directors of the National Cable & Telecommunications Association (“NCTA”) with Commissioner Jonathan S. Adelstein and his Legal Advisor Rudy Brioché, on Thursday, November 15, 2007. The group, which included large and small cable operators and independent programming network executives, discussed competitive issues facing both cable operators and cable programmers. It emphasized the \$100 billion investment by the industry in upgraded plant to provide competitive residential phone service and broadband service.

In particular, the group questioned published reports that the industry has reached both of the thresholds under the “70/70” test of Sec. 612 of the Cable Act of 1984. It emphasized that, for each cable operator, penetration of its service area lies well below 70 percent, and it is unlikely that other operators’ penetration levels differed markedly with these results. The group also urged the Commissioner, given the robust competition in both the video distribution and video programming markets, to take sufficient time to consider market facts before re-regulating aspects of the cable business.

Respectfully submitted,

/s/ **Daniel L. Brenner**

Daniel L. Brenner

Brian Roberts, Comcast Corporation
Philip Kent, Turner Broadcasting System, Inc.
William Bresnan, Bresnan Communications
Amy Tykeson, BendBroadband
Debra Lee, Black Entertainment Television, Inc.
Abbe Raven, A&E Television Networks

Rocco Commisso, Mediacom Communications
Jerald Kent, Suddenlink Communications
Neil Smit, Charter Communications
David Zaslav, Discovery Communications, Inc.
Robert Stanzone, ARRIS
George Bodenheimer, ESPN, Inc. and ABC Sports

cc: Commissioner Adelstein
Rudy Brioché