

Congress of the United States

Washington, DC 20515

December 20, 2010

28 DEC 2010 RCJ

The Honorable Julius Genachowski
Chairman
Federal Communications Commission
445 12th St., SW
Washington, D.C. 20554

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Dear Chairman Genachowski:

We are writing to urge the Federal Communications Commission (FCC) to cease pursuing the so-called "All Vid" proceeding. We believe this one-size-fits-all standard for the highly competitive pay TV market will adversely affect our constituents and our communities by putting jobs at the DIRECTV customer care operations centers located in our congressional districts and states in jeopardy.

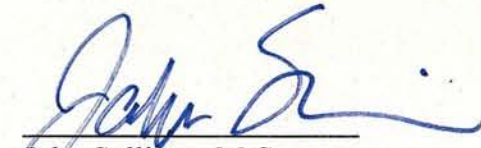
The FCC earlier this year opened a proceeding to examine the set-top box market and the methods by which consumers access multichannel video programming. We understand the FCC may put forth a rulemaking that requires cable, satellite and other video providers to develop an "all video adapter" – a device that is intended to make set-top boxes manufactured by any company compatible with all pay TV services.

DIRECTV testified before Congress that when it first launched its service in the mid-1990s, it had hundreds of models of set-top boxes from dozens of manufacturers, each with their own controls and features. However, as a result of an inconsistent format from a multitude of manufacturers, subscribers suffered from not being able to get direction from a common source, in this case, DIRECTV call centers, for even the most basic functions such as setting parental controls or turning on closed captioning. As it currently stands, without the FCC's "All-Vid" proposal, DIRECTV employs a number of different manufacturers to build boxes yet DIRECTV is still able to take responsibility for customer care and provide its subscribers with a consistent, consumer friendly user interface.

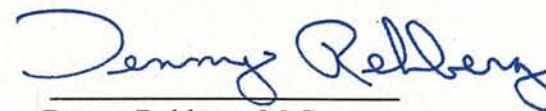
We fear the "All-Vid" proposal will turn back the clock to an era where there are no clear lines of responsibility for customer care. Currently, if there is a problem with a third party box, the subscriber will call DIRECTV's customer care center; not the manufacturer. Under the "All-Vid" proposal, DIRECTV will not be able to assist these callers. If the job producing call centers we represent in Tulsa, Oklahoma; Missoula, Montana; and Englewood, Colorado can't solve consumers' problems, these consumers will go elsewhere for their video service.

In summary, competition between pay TV providers and consumer choice are stronger than ever in this industry and leading to vast new job growth. We believe that the FCC should no longer pursue the All-Vid proceeding, avoiding a one-size-fits-all government mandate that promises to impede consumer choice and be a job killer.

Sincerely,


John Sullivan, M.C.

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Denny Rehberg, M.C.


Mike Coffman, M.C.

Cc: Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker