



**INTERNATIONAL
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WORKERS®**

900 Seventh Street, NW
Washington, DC 20001
202.833.7000
www.ibew.org

LONNIE R. STEPHENSON
International President

SAM J. CHILIA
International
Secretary-Treasurer

January 14, 2016

Ms. Marlene Dortch, Esq.
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

**Re: Implementation of Section 103 of the STELA Reauthorization
Act of 2014, Totality of Circumstances Test; MB Docket No. 15- 216**

Dear Ms. Dortch:

On behalf of the approximately 750,000 active members and retirees of the International Brotherhood of Electrical Workers (IBEW) I write in support of the current totality of the circumstances test and our broadcast partners' ability to negotiate retransmission consent agreements. The overwhelming majority of retransmission consent agreements are negotiated successfully and without incident, which I believe is evidence that the current totality of the circumstances test should be retained. Changes to the established test would not help consumers and would have a negative impact on the livelihoods of IBEW members in the broadcasting industry.

For years pay-TV providers were unwilling to compensate broadcasters for broadcast programming. Lacking significant market power, local broadcasters were content to be carried on cable and satellite systems free of charge even though pay-TV companies charged subscribers for content. Despite this fact, local broadcasters continued to develop local and national programming which has now become some of the most-watched programming across the United States.

Through retransmission consent agreements, broadcasters now receive compensation that is proportionate to the rise in viewership and their significant financial investment in content. This compensation is important for broadcasters, consumers, and IBEW members alike. It is used to support the industry through reinvestment in local and national content. Reinvestment helps fuel innovation and strengthens the position of IBEW members employed in the broadcasting industry. Both broadcasters and pay-TV providers now face healthy competition throughout the video marketplace. With the rapid expansion of content and platforms where that content can be viewed, the consumer experience has never been more robust.

For our employers in the broadcasting industry and the consumers that we all serve, retransmission consent agreements are vitally important. Broadcasters' ability to negotiate these agreements should not be interfered with. Thank you for your consideration, please do not hesitate to contact my office at (202) 728-6160 should you require additional information.

Sincerely yours,


Lonnie R. Stephenson
International President

LRS:mlm