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FEDERAL COMMUNICATIONS COMMISSION
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November 20, 2003

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ORIGINAL

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Notice of Ex Parte Presentation
MB Docket No. 03-124

Dear Ms. Dortch:

On behalf of Cablevision Systems Corporation ("Cablevision"), attached is a paper prepared by Daniel Rubinfeld of the University of California at Berkeley and LECG and Duncan Cameron of LECG for submission in the above-referenced proceeding.

Using the data provided by the Applicants on the 2000 retransmission consent dispute between Disney and Time Warner, and comparing DirecTV's subscriber growth in Time Warner-served areas of Houston with its growth in non-Time Warner-served areas of Houston and nationally, Professor Rubinfeld and Dr. Cameron demonstrate that **[REDACTED]**

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Pursuant to section 1.1206(b)(2) of the Commission's rules and the terms of the Second Protective Order entered in this proceeding, the original and one copy of this letter and the handout are being filed with the Office of the Secretary. Copies are also being served on Commission personnel. One copy of the Highly Confidential version of this filing has been filed with the Office of the Secretary.

Sincerely,

Tara M Corvo

Tara M. Corvo

Attachment

cc: Marcia Glauberman
Linda Senecal

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ESTIMATING THE EFFECT ON MVPD SUBSCRIBERSHIP OF THE MAY 2000 WITHHOLDING OF ABC NETWORK RETRANSMISSIONS FROM TIME WARNER HOUSTON CABLE SUBSCRIBERS

Dan Rubinfeld and Duncan Cameron
November 20, 2003

Previously, LECG demonstrated that a strategy of temporarily withholding retransmission of network programming is likely to be profitable if it resulted in something on the order of 1% or less of total MVPD subscribers switching from cable to DBS. Central to the debate thus far has been the likelihood that customer switching of this magnitude would result from temporary withholding of network retransmissions.

The 2000 retransmission dispute between Disney/ABC and Time Warner provides valuable information on this important issue. The incident[1/] resulted in Time Warner cable subscribers losing the ABC network signal for 39 hours on May 1st and 2nd; it was most hotly contested in Houston, where the story was front-page news as early as March 1, 2000. Both Disney and Time Warner took out full-page newspaper ads and Disney offered $99 (later $198) rebate vouchers to Time Warner subscribers who signed up with DirecTV. It has been reported that Disney issued 20,000 or more rebate vouchers to Houston Time Warner subscribers – about 3% of Time Warner's Houston subscriber base of about 665,000 at the time.

The FCC has recently requested actual subscribership, activations, and cancellations by month and zip code for the period January 1999 to December 2000 from DirecTV. We used this information to quantify the effect of the incident on MVPD subscriber switching.

1/ We use the term "incident" to refer to the date withdrawal of the programming became a credible threat.

The Data

DirecTV provided monthly subscribership, activations, and cancellations for _____ zip codes for the 24 months January 1999 to December 2000.[2/] Because the possible withdrawal of ABC programming from Time Warner Cable-Houston customers was public knowledge by March 2000, we parsed the time period into the 14 months (Jan. 99-Feb. 00) "before" the incident, and the 10 months (Mar. 00-Dec.00) "after" the incident.

We focused our attention on 446 Houston DMA ("Designated Market Area") zip codes, which included 188 unique zip codes that were served by Time Warner Cable-Houston (available from Time Warner Cable's advertising department) and 258 that were served by other cable operators. However, zip codes outside the Houston DMA were also utilized for control purposes.

The Questions

The data allow us to address two related questions. First, did the withholding of ABC's network retransmissions from areas served by Time Warner Cable result in discernibly different DirecTV subscriber acquisition rates? To answer this question we compared DirecTV subscriber growth rates in the Houston Time Warner area to DirecTV subscriber growth rates in two "control areas": non-Time Warner portions of the Houston DMA, and the U.S. excluding Time Warner portions of the Houston DMA. Second, can one quantify the extent of MVPD subscriber switching resulting from the incident? To do this we estimated the number of subscribers that DirecTV would have gained had there been no effect on subscriber switching resulting from temporary withholding of ABC network programming.

2/ DirecTV provided [REDACTED].

Results

a) Withdrawing the Fox Broadcast Signal Had a Significant Effect on DirecTV Subscriber Growth.

To test whether the incident had a significant effect on DirecTV subscribership in Houston zip codes served by Time Warner, we regressed monthly percentage changes (growth rates) in DirecTV subscribership in zip codes served by Time Warner Cable-Houston on, alternatively, growth rates in non-Time Warner Cable served zip codes in the Houston DMA and the remainder of the U.S. We used a standard econometric test to see whether the subscriber-growth relationship was different before and after the incident. Specifically, we compared an "unrestricted" relationship between the growth rates during the period Jan. 99-Feb. 00, the period before the incident, to a relationship that was "restricted" to also include the Mar. 00-Dec.00 period after the incident.[3/] The calculated F values [REDACTED] the critical values at standard levels of significance. We concluded that there is strong statistical evidence that [REDACTED]

b) [REDACTED]

We also estimated the number of subscribers gained by DirecTV in the Time Warner Cable-Houston served areas, assuming that, absent the incident, DirecTV subscriber growth rates would have been no different than DirecTV growth rates experienced in otherwise comparable areas. For otherwise comparable areas we use the non-Time Warner served areas of the Houston DMA and, alternatively, the rest of the U.S.

3/ See, Pindyck & Rubinfeld, Econometric Models & Economic Forecasts, McGraw Hill, 4th ed., Chapter 5. The F-test is given by:

$$\frac{(SSE_R - SSE_{UR})/(n_r - n_{UR})}{SSE_{UR}/(n_{UR} - k)} \approx F(n_r - n_{UR}, n_{UR} - k).$$ [Redacted]

The attached tables show the calculations, and the attached graphs visually represent the calculations. In each case, the actual DirecTV subscribership is compared to the DirecTV subscribership that would have resulted had DirecTV experienced in the Time Warner served areas of the Houston DMA the same growth rates experienced in other areas. The comparison between the Houston Time Warner and non-Time Warner served areas is particularly interesting because non-Time Warner cable customers in Houston were likely exposed to much the same news coverage of the incident. Of course, these cable users did not lose retransmissions of ABC network programming during the 39-hour period.

In addition, local-into-local broadcast station carriage was launched in the Houston DMA by DirecTV in December 1999 and by EchoStar in January 2000. Comparing Time Warner and non-Time Warner Houston systems controls for the impact of the introduction of local broadcast station service in Houston by DBS carriers.

We note that the DirecTV subscriber growth rates in the Time Warner Cable-Houston areas [REDACTED]

.

The tables also [REDACTED]

.

It is reported that Echostar also experienced subscriber gains during the incident. Assuming that Echostar was gaining new subscribers at approximately the same rate as DirecTV,[4/] the total gain to DBS providers could be as much as ___% in the Houston DMA comparison. Echostar's

4/ Between Dec. 31, 1999 and Dec. 31, 2000, DirecTV gained 1.8 million net new subscribers (see, Hughes 2000 Annual Report), while Echostar gained 1.85 million new subscribers (see, Form 10-K for Fiscal Year End December 31, 2000, Echostar Communications Corporation).

subscriber gains are important because Echostar retained the ABC retransmissions throughout, and, like DirecTV, was another alternative for cable subscribers who valued the ABC network retransmissions.

subs, Pre-Incident Data: TW=A + B(DMA)

The REG Procedure
Model: MODEL1
Dependent Variable: pc_tw

Analysis of Variance					
Source	DF	Sum of Squares	Mean Square	F Value	Pr > F
Model					
Error					
Corrected Total					

Root MSE		R-Square	
Dependent Mean		Adj R-Sq	
Coeff Var			

Parameter Estimates					
Variable	DF	Parameter Estimate	Standard Error	t Value	Pr > |t|
Intercept					
pc_dma					

subs, Full Data: TW=A + B(DMA)

The REG Procedure
Model: MODEL1
Dependent Variable: pc_tw

Analysis of Variance					
Source	DF	Sum of Squares	Mean Square	F Value	Pr > F
Model					
Error					
Corrected Total					

Root MSE		R-Square	
Dependent Mean		Adj R-Sq	
Coeff Var			

Parameter Estimates					
Variable	DF	Parameter Estimate	Standard Error	t Value	Pr > |t|
Intercept					
pc_dma					

subs, Pre-Incident Data: TW=A + B(US)

The REG Procedure
Model: MODEL1
Dependent Variable: pc_tw

Analysis of Variance					
Source	DF	Sum of Squares	Mean Square	F Value	Pr > F
Model					
Error					
Corrected Total					

Root MSE		R-Square	
Dependent Mean		Adj R-Sq	
Coeff Var			

Parameter Estimates					
Variable	DF	Parameter Estimate	Standard Error	t Value	Pr > |t|
Intercept					
pc_us					

subs, Full Data: TW=A + B(US)

The REG Procedure
Model: MODEL1
Dependent Variable: pc_tw

Analysis of Variance					
Source	DF	Sum of Squares	Mean Square	F Value	Pr > F
Model					
Error					
Corrected Total					

Root MSE		R-Square	
Dependent Mean		Adj R-Sq	
Coeff Var			

Parameter Estimates					
Variable	DF	Parameter Estimate	Standard Error	t Value	Pr > |t|
Intercept					
pc_us					

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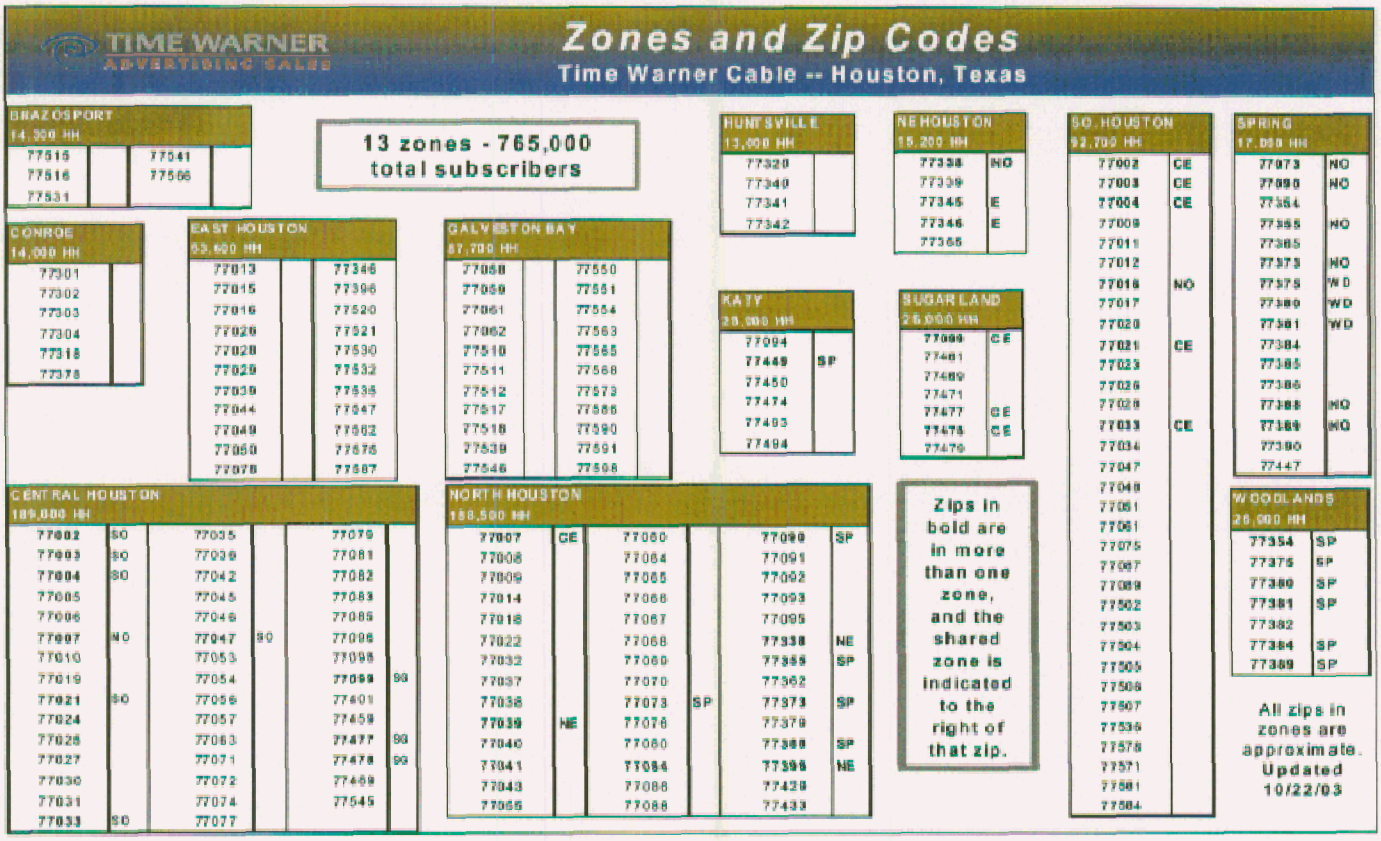

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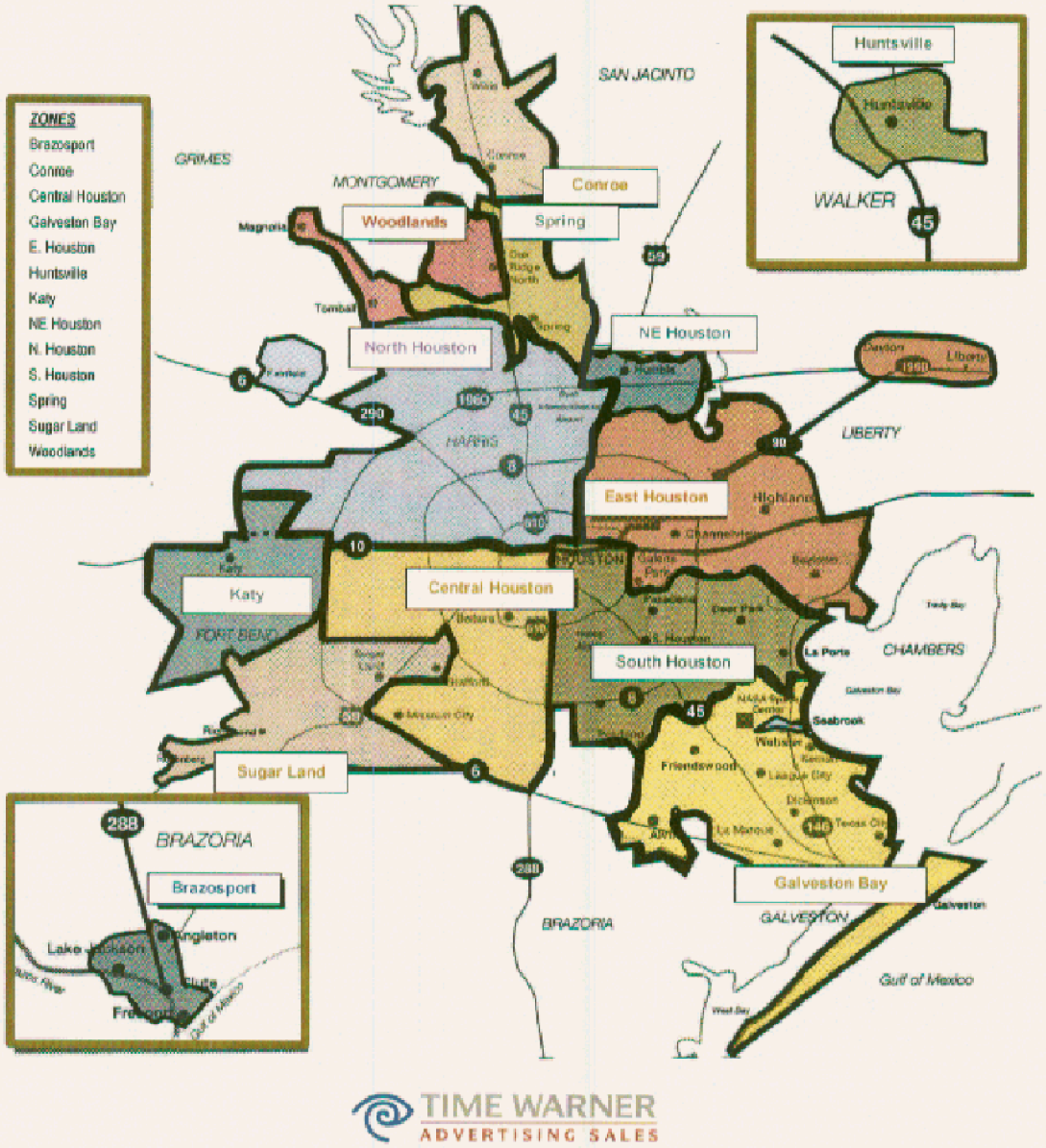
Time Warner Houston

13 Zones ✦ 765,000 Households



TIME WARNER
ADVERTISING SALES

This map is intended to be a general coverage area reference. For specific details contact your Account Executive. 9/18/03

Houston DMA Counties and Zip Codes

Zip Code	City	County
77418	BELLVILLE	Austin
77426	CHAPPELL HILL	Austin
77452	KENNEY	Austin
77473	SAN FELIPE	Austin
77474	SEALY	Austin
77485	WALLIS	Austin
77833	BRENHAM	Austin
78931	BLEIBLERVILLE	Austin
78933	CAT SPRING	Austin
78940	FAYETTEVILLE	Austin
78944	INDUSTRY	Austin
78950	NEW ULM	Austin
78954	ROUND TOP	Austin
77047	HOUSTON	Brazoria
77422	BRAZORIA	Brazoria
77430	DAMON	Brazoria
77431	DANCIGER	Brazoria
77444	GUY	Brazoria
77463	OLD OCEAN	Brazoria
77480	SWEENY	Brazoria
77486	WEST COLUMBIA	Brazoria
77511	ALVIN	Brazoria
77512	ALVIN	Brazoria
77515	ANGLETON	Brazoria
77516	ANGLETON	Brazoria
77531	CLUTE	Brazoria
77534	DANBURY	Brazoria
77541	FREEPORT	Brazoria
77542	FREEPORT	Brazoria
77546	FRIENDSWOOD	Brazoria
77566	LAKE JACKSON	Brazoria
77577	LIVERPOOL	Brazoria
77578	MANVEL	Brazoria
77581	PEARLAND	Brazoria
77583	ROSHARON	Brazoria
77584	PEARLAND	Brazoria
77588	PEARLAND	Brazoria
77465	PALACIOS	Calhoun
77978	POINT COMFORT	Calhoun
77979	PORT LAVACA	Calhoun
77982	PORT O CONNOR	Calhoun
77983	SEADRIFT	Calhoun
77990	TIVOLI	Calhoun

77514	ANAHUAC	Chambers
77520	BAYTOWN	Chambers
77521	BAYTOWN	Chambers
77535	DAYTON	Chambers
77560	HANKAMER	Chambers
77575	LIBERTY	Chambers
77580	MONT BELVIEU	Chambers
77597	WALLISVILLE	Chambers
77622	HAMSHIRE	Chambers
77661	STOWELL	Chambers
77665	WINNIE	Chambers
77412	ALTAIR	Colorado
77434	EAGLE LAKE	Colorado
77435	EAST BERNARD	Colorado
77442	GARWOOD	Colorado
77455	LOUISE	Colorado
77460	NADA	Colorado
77470	ROCK ISLAND	Colorado
77474	SEALY	Colorado
77475	SHERIDAN	Colorado
77964	HALLETTSVILLE	Colorado
78933	CAT SPRING	Colorado
78934	COLUMBUS	Colorado
78935	ALLEYTON	Colorado
78940	FAYETTEVILLE	Colorado
78943	GLIDDEN	Colorado
78950	NEW ULM	Colorado
78951	OAKLAND	Colorado
78956	SCHULENBURG	Colorado
78962	WEIMAR	Colorado
77053	HOUSTON	Fort Bend
77082	HOUSTON	Fort Bend
77083	HOUSTON	Fort Bend
77085	HOUSTON	Fort Bend
77099	HOUSTON	Fort Bend
77406	RICHMOND	Fort Bend
77417	BEASLEY	Fort Bend
77420	BOLING	Fort Bend
77423	BROOKSHIRE	Fort Bend
77430	DAMON	Fort Bend
77435	EAST BERNARD	Fort Bend
77441	FULSHEAR	Fort Bend
77444	GUY	Fort Bend
77450	KATY	Fort Bend
77451	KENDLETON	Fort Bend
77459	MISSOURI CITY	Fort Bend
77461	NEEDVILLE	Fort Bend
77464	ORCHARD	Fort Bend

77469	RICHMOND	Fort Bend
77471	ROSENBERG	Fort Bend
77476	SIMONTON	Fort Bend
77477	STAFFORD	Fort Bend
77478	SUGAR LAND	Fort Bend
77479	SUGAR LAND	Fort Bend
77481	THOMPSONS	Fort Bend
77485	WALLIS	Fort Bend
77487	SUGAR LAND	Fort Bend
77489	MISSOURI CITY	Fort Bend
77493	KATY	Fort Bend
77494	KATY	Fort Bend
77496	SUGAR LAND	Fort Bend
77497	STAFFORD	Fort Bend
77545	FRESNO	Fort Bend
77583	ROSHARON	Fort Bend
77356	MONTGOMERY	Grimes
77363	PLANTERSVILLE	Grimes
77484	WALLER	Grimes
77830	ANDERSON	Grimes
77831	BEDIAS	Grimes
77861	IOLA	Grimes
77868	NAVASOTA	Grimes
77873	RICHARDS	Grimes
77875	ROANS PRAIRIE	Grimes
77876	SHIRO	Grimes
77510	SANTA FE	Galveston
77511	ALVIN	Galveston
77517	SANTA FE	Galveston
77518	BACLIFF	Galveston
77539	DICKINSON	Galveston
77546	FRIENDSWOOD	Galveston
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77554	GALVESTON	Galveston
77555	GALVESTON	Galveston
77563	HITCHCOCK	Galveston
77565	KEMAH	Galveston
77568	LA MARQUE	Galveston
77573	LEAGUE CITY	Galveston
77574	LEAGUE CITY	Galveston
77590	TEXAS CITY	Galveston
77591	TEXAS CITY	Galveston
77592	TEXAS CITY	Galveston
77617	GILCHRIST	Galveston

77623	HIGH ISLAND	Galveston
77650	PORT BOLIVAR	Galveston
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77297	HOUSTON	Harris
77298	HOUSTON	Harris
77299	HOUSTON	Harris
77315	NORTH HOUSTON	Harris
77325	HUMBLE	Harris
77336	HUFFMAN	Harris
77338	HUMBLE	Harris
77339	HUMBLE	Harris
77345	HUMBLE	Harris
77346	HUMBLE	Harris
77347	HUMBLE	Harris
77357	NEW CANEY	Harris
77365	PORTER	Harris

77373	SPRING	Harris
77375	TOMBALL	Harris
77377	TOMBALL	Harris
77379	SPRING	Harris
77381	SPRING	Harris
77382	SPRING	Harris
77383	SPRING	Harris
77388	SPRING	Harris
77389	SPRING	Harris
77391	SPRING	Harris
77396	HUMBLE	Harris
77401	BELLAIRE	Harris
77402	BELLAIRE	Harris
77410	CYPRESS	Harris
77411	ALIEF	Harris
77413	BARKER	Harris
77429	CYPRESS	Harris
77433	CYPRESS	Harris
77447	HOCKLEY	Harris
77449	KATY	Harris
77450	KATY	Harris
77477	STAFFORD	Harris
77484	WALLER	Harris
77489	MISSOURI CITY	Harris
77491	KATY	Harris
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77494	KATY	Harris
77501	PASADENA	Harris
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77507	PASADENA	Harris
77508	PASADENA	Harris
77520	BAYTOWN	Harris
77521	BAYTOWN	Harris
77522	BAYTOWN	Harris
77530	CHANNELVIEW	Harris
77532	CROSBY	Harris
77535	DAYTON	Harris
77536	DEER PARK	Harris
77539	DICKINSON	Harris
77546	FRIENDSWOOD	Harris
77547	GALENA PARK	Harris
77550	GALVESTON	Harris
77562	HIGHLANDS	Harris

77568	LA MARQUE	Harris
77571	LA PORTE	Harris
77572	LA PORTE	Harris
77581	PEARLAND	Harris
77586	SEABROOK	Harris
77587	SOUTH HOUSTON	Harris
77598	WEBSTER	Harris
77656	SILSBEE	Harris
77455	LOUISE	Jackson
77465	PALACIOS	Jackson
77957	EDNA	Jackson
77961	FRANCITAS	Jackson
77962	GANADO	Jackson
77969	LA SALLE	Jackson
77970	LA WARD	Jackson
77971	LOLITA	Jackson
77979	PORT LAVACA	Jackson
77991	VANDERBILT	Jackson
77327	CLEVELAND	Liberty
77328	CLEVELAND	Liberty
77357	NEW CANEY	Liberty
77368	ROMAYOR	Liberty
77369	RYE	Liberty
77371	SHEPHERD	Liberty
77372	SPLENDORA	Liberty
77532	CROSBY	Liberty
77533	DAISETTA	Liberty
77535	DAYTON	Liberty
77538	DEVERS	Liberty
77561	HARDIN	Liberty
77564	HULL	Liberty
77575	LIBERTY	Liberty
77582	RAYWOOD	Liberty
77404	BAY CITY	Matagorda
77414	BAY CITY	Matagorda
77415	CEDAR LANE	Matagorda
77419	BLESSING	Matagorda
77420	BOLING	Matagorda
77428	COLLEGEPORT	Matagorda
77440	ELMATON	Matagorda
77456	MARKHAM	Matagorda
77457	MATAGORDA	Matagorda
77458	MIDFIELD	Matagorda
77465	PALACIOS	Matagorda
77468	PLEDGER	Matagorda
77480	SWEENY	Matagorda
77482	VAN VLECK	Matagorda
77483	WADSWORTH	Matagorda

77301	CONROE	Montgomery
77302	CONROE	Montgomery
77303	CONROE	Montgomery
77304	CONROE	Montgomery
77305	CONROE	Montgomery
77306	CONROE	Montgomery
77316	MONTGOMERY	Montgomery
77318	WILLIS	Montgomery
77327	CLEVELAND	Montgomery
77328	CLEVELAND	Montgomery
77333	DOBBIN	Montgomery
77339	HUMBLE	Montgomery
77353	MAGNOLIA	Montgomery
77354	MAGNOLIA	Montgomery
77355	MAGNOLIA	Montgomery
77356	MONTGOMERY	Montgomery
77357	NEW CANEY	Montgomery
77358	NEW WAVERLY	Montgomery
77362	PINEHURST	Montgomery
77365	PORTER	Montgomery
77372	SPLENDORA	Montgomery
77378	WILLIS	Montgomery
77380	SPRING	Montgomery
77381	SPRING	Montgomery
77382	SPRING	Montgomery
77384	CONROE	Montgomery
77385	CONROE	Montgomery
77386	SPRING	Montgomery
77387	SPRING	Montgomery
77393	SPRING	Montgomery
77447	HOCKLEY	Montgomery
77873	RICHARDS	Montgomery
75934	CAMDEN	Camden
75936	CHESTER	Camden
75939	CORRIGAN	Camden
75960	MOSCOW	Camden
77326	ACE	Camden
77332	DALLARDSVILLE	Camden
77335	GOODRICH	Camden
77350	LEGGETT	Camden
77351	LIVINGSTON	Camden
77360	ONALASKA	Camden
77399	LIVINGSTON	Camden
77320	HUNTSVILLE	San Jacinto
77327	CLEVELAND	San Jacinto
77328	CLEVELAND	San Jacinto
77331	COLDSPRING	San Jacinto
77358	NEW WAVERLY	San Jacinto

77359	OAKHURST	San Jacinto
77364	POINTBLANK	San Jacinto
77371	SHEPHERD	San Jacinto
77378	WILLIS	San Jacinto
75852	MIDWAY	Walker
75862	TRINITY	Walker
77320	HUNTSVILLE	Walker
77334	DODGE	Walker
77340	HUNTSVILLE	Walker
77341	HUNTSVILLE	Walker
77342	HUNTSVILLE	Walker
77358	NEW WAVERLY	Walker
77367	RIVERSIDE	Walker
77378	WILLIS	Walker
77873	RICHARDS	Walker
77355	MAGNOLIA	Waller
77363	PLANTERSVILLE	Waller
77423	BROOKSHIRE	Waller
77445	HEMPSTEAD	Waller
77446	PRAIRIE VIEW	Waller
77447	HOCKLEY	Waller
77466	PATTISON	Waller
77484	WALLER	Waller
77493	KATY	Waller
77494	KATY	Waller
77426	CHAPPELL HILL	Washington
77833	BRENHAM	Washington
77834	BRENHAM	Washington
77835	BURTON	Washington
77868	NAVASOTA	Washington
77880	WASHINGTON	Washington
78932	CARMINE	Washington
78946	LEDBETTER	Washington
77420	BOLING	Wharton
77432	DANEVANG	Wharton
77434	EAGLE LAKE	Wharton
77435	EAST BERNARD	Wharton
77436	EGYPT	Wharton
77437	EL CAMPO	Wharton
77443	GLEN FLORA	Wharton
77448	HUNGERFORD	Wharton
77453	LANE CITY	Wharton
77454	LISSIE	Wharton
77455	LOUISE	Wharton
77467	PIERCE	Wharton
77485	WALLIS	Wharton
77488	WHARTON	Wharton