

## Stranger in a Strange Land: My Summer in Washington D.C.

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This summer I picked up my family and moved to the nation's capital for an internship with the National Cable and Telecommunications Association (NCTA). My wife and I both enjoyed the experience very much. Washington is a great city with endless events and attractions and we enjoyed as many as we had energy and time to visit.

My experience at NCTA was very positive. The Legal Department welcomed me with arms wide open and Rick Chessen could not have been nicer to me. I worked mostly for, and reported to, Stephanie Podey, who was an excellent mentor and is a talented lawyer.

The first big project that I worked on was to help research and write NCTA's comments on Program Access. In the 1992 Cable Act, Congress prohibited Cable Operators from exclusively providing a cable network of which the operator has an attributable interest. That exclusivity prohibition was mandated to sunset in 2002 unless the FCC found it necessary to "preserve and protect competition," which the FCC did in 2002 and 2007. The prohibition is scheduled to sunset on October 5, 2012 unless the FCC finds it necessary to again extend the prohibition.

On June 22, NCTA filed comments in support of an FCC proceeding to sunset the prohibition on exclusive contracts. NCTA argued that the goal of thriving competition in the marketplace has been accomplished and vertical integration no longer threatens the video marketplace. Furthermore, NCTA argued the prohibition on vertical integration is a violation of a cable operator's freedom of speech. On July 23, NCTA filed reply comments, which I also

worked on, arguing the development of the video marketplace since 1992 requires the FCC to sunset the exclusivity prohibition.

The next big project I worked on was to write up a memo summarizing the FCC's proposed regulatory fee reform. On July 17, the FCC released a Notice of Proposed Rulemaking ("Notice") on reforming the regulatory fee regime. The proposed changes in regulatory fees would slightly increase the amount of fees allocated to the Media Bureau and significantly reduce fees allocated to the Wireline Bureau. Much of the Notice deals with updating the allocation of Full Time Employees ("FTEs") across FCC Bureaus, but it also asks a number of broad questions of interest to the cable industry, including whether (and how) broadband should be added to the fee schedule and how to account for "benefits provided to the payor." Because I wrote this memo by myself I plan to use it as a writing sample in applying to internships for this school year and next summer.

I loved the Wednesday meetings, I was able to attend every week, and found most all of the speakers informative and entertaining. Gene Kimmelman mentioned the possibility of hosting students during a Spring or Fall semester as a seminar-style program. While I probably wouldn't be interested in this program myself, I think it could be very fruitful. It would give students the opportunity to work on a long format review of a hot-button issue in the only place where National Telecommunication Policy is practiced.

Thank you so much for this opportunity. I've strived to repay the kindness by taking full advantage of the learning experience. I've also tried to be an ambassador for CU Law and the Silicon Flatirons.