



Re: AOR 2015-10  
Sai. to: ao  
Cc: MYL Core Team

09/21/2015 01:59 PM

Regarding AOR 2015-10 (Fox):

Ads are very frequently sold based on e.g. a cost per number of 1,000 impressions (CPM). We assume that Fox, as part of selling advertisements on its networks (including the RSNs), must keep track of the number of expected viewers for any given advertisement.

We therefore have three simple factual questions that we hope the requester will answer by supplement:

- a) Approximately how many unique viewers does Fox expect the contemplated advertisements to reach in each US state, district, & territory?
- b) How are those numbers calculated?
- c) Is this how Fox would normally calculate viewership, e.g. for ratings, sales, residuals, and similar ordinary business purposes?

Fox is best placed to calculate and certify the number of viewers the contemplated advertisements will reach in each state.

While 11 CFR 100.29(b)(7) gives broad guidance, the request appears to ask about a situation not contemplated by the regulation, but which should be well answered by Fox's ordinary business records.

We respectfully submit that the Commission, not being expert on how television advertising networks operate, should consult with the FCC regarding the technical aspects of this request.

We do not express any direct view on the question as posed in the AOR, since we have no such expertise either (nor any opinion on matters that lie outside of political law).

Sincerely,  
Sai  
President, Make Your Laws PAC/C4/C3