lawrence r. hayes
Senior Vice President
and General Counsel
p. 484.701.8192 f. 484.701.1021
larry.hayes@qvc.com

May 10, 2013

Douglas Bell
Chair
Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 17th Street, N.W.
Washington, DC 20508

RE: Transatlantic Trade and Investment Partnership Comments

QVC, Inc. ("QVC") welcomes the opportunity to respond to the request from the Office of the U.S. Trade Representative ("USTR") for comments on the Administration's intention to enter into negotiations with the European Union ("EU") for a Transatlantic Trade and Investment Partnership ("TTIP"). We strongly support this effort to achieve a substantial increase in transatlantic trade and investment through deeper economic integration between the European Union and the United States, notably through the negotiation of a comprehensive free trade agreement. Greater regulatory harmonization, as envisioned by the High Level Working Group on Jobs and Growth, would be a significant step toward forging a stronger economic partnership across the Atlantic.

By way of background, QVC markets and sells a wide variety of consumer products, primarily through televised retail shopping programs distributed to approximately 214 million households worldwide each day and via our websites and other interactive media, including QVC.com. We are the global leader in television retailing and a leading multimedia retailer, with operations based in the U.S., Japan, Germany, the United Kingdom, and Italy (including a locally-produced televised shopping program and associated web sites in each country), supported by approximately 17,000 employees worldwide, including approximately 9,000 in the U.S., and approximately 6,000 in the EU. Additionally, we have a 49% interest in a retailing joint venture in China, which operates through a television shopping channel.

QVC stands for "Quality, Value and Convenience," which is what we strive to deliver to our customers. We market our products in an engaging, entertaining format primarily through live television programs and interactive features on our websites. In the U.S., we distribute our programming live 24 hours per day, 364 days per year and present on average almost 1,000 products every week. Internationally, we distribute live programming 17 to 24 hours per day, depending on the market. For the fiscal year ended December 31, 2012, QVC had global net revenue of approximately $8.5 billion.

Distance retailing (including sales through television and e-commerce) is becoming an increasingly used and vital component of the retail industry within a well functioning economy. An open and transparent system for retail and distribution services promotes competition, reduces the cost of essential goods for consumers, and creates jobs throughout the global supply chain. For example, each time QVC launches a televised retail shopping program and associated web site in a new country, such launch results in employment opportunities for individuals in the U.S. and the host country. QVC market entry also creates export opportunities for QVC's product vendors, many of which are based in the U.S., as well as growth opportunities locally and abroad for businesses in the host country.

Despite these benefits, barriers to trade in the television shopping industry are significant in many markets. In particular, many countries maintain significant regulatory barriers to entry for television programmers such as QVC based on the nationality of their ultimate owner(s), which limit or effectively preclude QVC's participation in the television shopping business in these countries. Such restrictions have historically been justified by governments based on their views that television is a public service representing vital cultural, historical, political, or artistic content which should be produced and controlled locally. Some governments, however, have not recognized that commercial programming, such as the sale of consumer goods, is distinguishable from the aforementioned types of programming.

QVC does not seek to overturn television programming restrictions with regard to content that is of a cultural, historical, political, or artistic nature. However, where the programming is of a purely commercial nature and adhering to programming rules of general applicability, such as QVC's televised retail shopping programs, we believe that the restrictions on foreign ownership of such programmers is unwarranted, and should be eliminated. As such, QVC recommends that USTR seek to establish full market access and national treatment for retailing services offered via television by permitting unrestricted foreign ownership of programming channels and/or their licenses when used for the purposes of promoting consumer products through all forms of television transmission, including terrestrial (free-to-air) broadcast, cable television, DTH satellite, and IPTV. Greater access to television retail programming has a number of benefits for Europe as well, including greater choice for consumers, increased demand for EU services (*e.g.*, express delivery, transportation, warehousing, and payments) and access for European entrepreneurs, including small and medium-sized businesses, to a proven distribution channel for their products. This can result in a true win for both economies.

We look forward to working with the Administration as the negotiations proceed. Thank you for your consideration of these comments.

Sincerely,

/s/ Lawrence R. Hayes

Lawrence R. Hayes
Senior Vice President, General Counsel