

APRIL 17, 2015



## Chairman Tom Wheeler

Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Re: Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations, MB Docket No. 14-57

Dear Chairman Wheeler:

It has been more than a year since Comcast announced its intention to acquire Time Warner Cable to form a cable TV and ISP behemoth. The combined company would, among other things: control over half of the high-speed residential broadband connections in the United States; dominate pay-TV across the nation; combine even stronger distribution muscle with NBC-Universal's "must-have" video programming; and control critical advertising and set-top-box inputs.

Opposition to this merger began the day the deal was announced and has grown to historic proportions. Over 700,000 Americans have called on you to reject the proposed merger, far more people than have opposed any other merger in the history of the Commission. Diverse industry and public interest group stakeholders (several of which are represented by the signatories below) have filed extensive documents in strong opposition to the merger.

The message is clear: the Commission should reject this merger because it would result in too much power in the hands of one company.

You have staked your chairmanship on the importance of fostering competition to protect consumers and spur innovation, investment, lower prices and diversity. We agree. And the only way to protect that competitive future now is to reject the Comcast/Time Warner Cable merger outright — no conditions, no side deals — no merger, period.

As the record demonstrates, and particularly for a company with a track record of disregarding conditions from its last major acquisition, Comcast cannot be relied upon to comply with new conditions that run counter to its built-in incentives to exploit the new market power it would gain from the proposed merger. This is especially true when the sheer size and scope of a combined Comcast/Time Warner Cable, coupled with its incentive to protect its core video business from innovative “over-the-top” online video providers, would allow it to threaten nascent competition in so many different ways. If the Commission approves the merger believing that conditions can somehow prevent or address these harms, there is no going back. The consequences of getting it wrong are too great, the risks simply too high. The public deserves better.

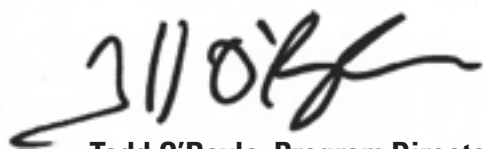
Your steadfast commitment to competition would risk being eviscerated if Comcast were allowed to control over 50% of high-speed residential broadband connections nationwide. No condition, including but not limited to a “net neutrality” provision modeled on the Open Internet order, can address the myriad ways a combined Comcast/Time Warner Cable would be able to thwart competition and convert its massive network into a closed system of preferential treatment for its own content or the content of a select few.

We urge you to follow through on your commitment to competition as the single greatest source of innovation, investment and other consumer benefits. Reject the Comcast/Time Warner Cable merger.

Respectfully submitted,



**Antonio Briceno, Managing Director**  
beIN Sports



**Todd O'Boyle, Program Director**  
Common Cause

**Amina N. Fazlullah, Director of Policy**  
Benton Foundation

**Angie Kronenberg, Chief Advocate and GC**  
COMPTEL

**Robert Beury, Chief Legal Officer**  
Cogent Communications

**Linda Sherry, Director, National Priorities**  
Consumer Action

**Brandi Collins, Media Justice Director**  
Color of Change

**Ed Black, President & CEO**  
Computer & Communications Industry  
Association

**Mark Cooper, Research Director**  
Consumer Federation of America (CFA)

**Ellen Bloom, Senior Director, Federal Policy**  
Consumers Union

**Eddie Kurtz, Executive Director**  
Courage Campaign

**David Segal, Executive Director/Co-Founder**  
Demand Progress

**Jeffrey Blum, Deputy General Counsel**  
DISH Network

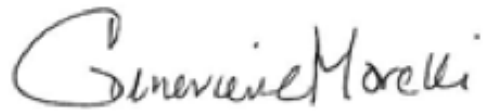
**Evan Engstrom, Policy Director**  
Engine

**Matt Wood, Policy Director**  
Free Press

**Casey Rae, Chief Executive Officer**  
Future of Music Coalition



**Orson Aguilar, Executive Director**  
The Greenlining Institute



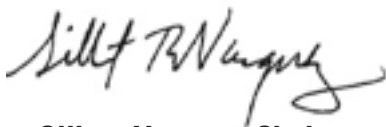
**Genevieve Morelli, President**  
ITTA



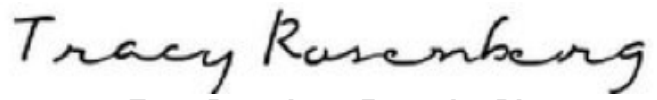
**Jesse Miranda, Founder**  
Jesse Miranda Center for Hispanic Leadership



**Mike Gravino**  
LPTV Coalition



**Gilbert Vasquez, Chair**  
Los Angeles Latino Chamber of Commerce



**Tracy Rosenberg, Executive Director**  
Media Alliance



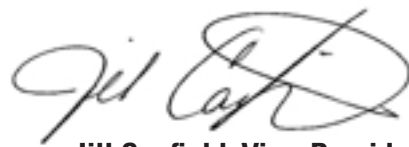
**Wendy Levy, Executive Director**  
National Alliance for Media Arts and Culture



**Robert Gnaizda, General Counsel**  
National Asian American Coalition



**Joshua Stager, Policy Counsel**  
New America's Open Technology Institute



**Jill Canfield, Vice-President of Legal & Industry Assistant General Counsel**  
NTCA – The Rural Broadband Association



**Steve Anderson, Executive Director**  
OpenMedia



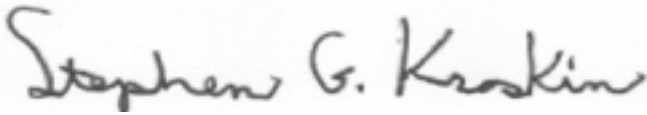
**Tim Winter, President**  
Parents Television Council



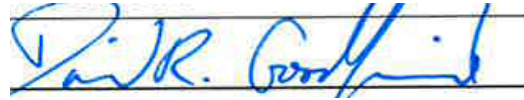
**Arturo Carmona, Executive Director**  
Presente



**Gene Kimmelman, President and CEO**  
Public Knowledge



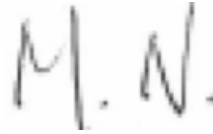
**Stephen G. Kraskin, President**  
Rural Broadband Alliance



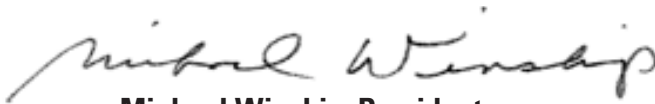
**David Goodfriend, Chairman**  
Sports Fans Coalition



**Mark Toney, Executive Director**  
TURN



**Michael Norton, President**  
WeatherNation



**Michael Winship, President**  
Writers Guild of America, East, AFL-CIO



**Chris Keyser, President**  
Writers Guild of America, West



**Sameer Targe, General Manager**  
Zee Network

CC: **Commissioner Mignon Clyburn**  
**Commissioner Jessica Rosenworcel**  
**Commissioner Ajit Pai**  
**Commissioner Michael O’Rielly**