

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.

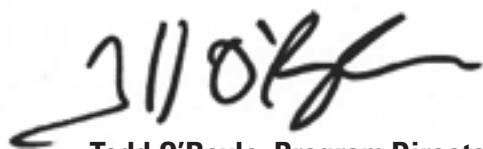
Your steadfast commitment to competition would risk being eviscerated if Comcast were allowed to control over 50% of high-speed residential broadband connections nationwide. No condition, including but not limited to a “net neutrality” provision modeled on the Open Internet order, can address the myriad 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



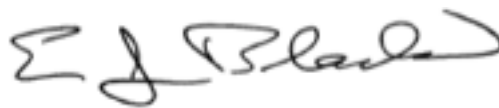
Robert Beury, Chief Legal Officer
Cogent Communications



Linda Sherry, Director, National Priorities
Consumer Action



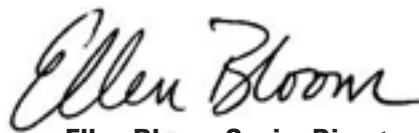
Brandi Collins, Media Justice Director
Color of Change



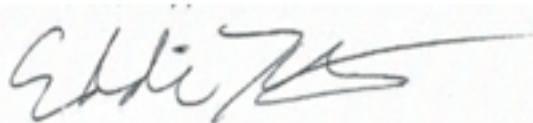
Ed Black, President & CEO
Computer & Communications Industry
Association



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



Ellen Bloom, Senior Director, Federal Policy
Consumers Union



Eddie Kurtz, Executive Director
Courage Campaign



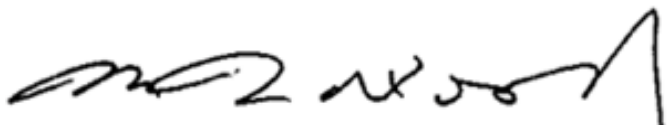
David Segal, Executive Director/Co-Founder
Demand Progress



Jeffrey Blum, Deputy General Counsel
DISH Network



Evan Engstrom, Policy Director
Engine



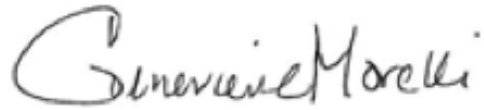
Matt Wood, Policy Director
Free Press



Casey Rae, Chief Executive Officer
Future of Music Coalition



Orson Aguilar, Executive Director
The Greenlining Institute



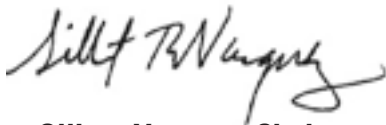
Genevieve Morelli, President
ITTA



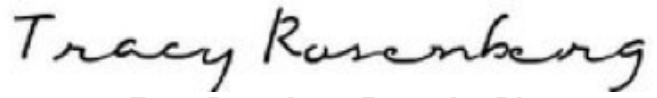
Jesse Miranda, Founder
Jesse Miranda Center for Hispanic Leadership



Mike Gravino
LPTV Coalition



Gilbert Vasquez, Chair
Los Angeles Latino Chamber of Commerce



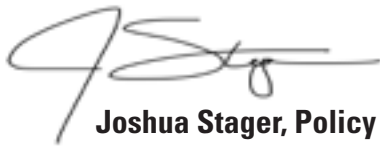
Tracy Rosenberg, Executive Director
Media Alliance



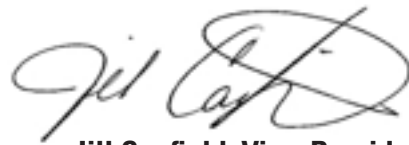
Wendy Levy, Executive Director
National Alliance for Media Arts and Culture



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



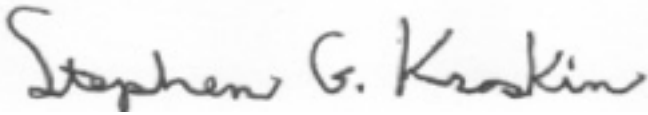
Tim Winter, President
Parents Television Council



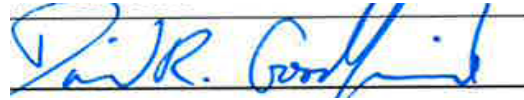
Arturo Carmona, Executive Director
Presente



Gene Kimmelman, President and CEO
Public Knowledge



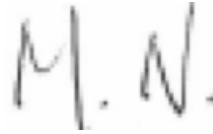
Stephen G. Kraskin, President
Rural Broadband Alliance



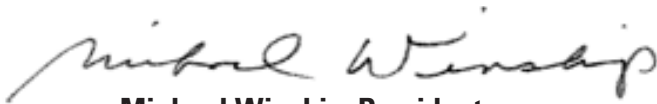
David Goodfriend, Chairman
Sports Fans Coalition



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