Aug. 25, 2014

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554
Proposed Comcast – Time Warner Cable Merger
MB Docket No. 14-57

Dear Chairman Wheeler and Commissioners Clyburn, Rosenworcel, Pai and O'Rielly:

I am writing on behalf of Consumer Watchdog, a nonpartisan nonprofit public interest group, to ask that the Federal Communications Commission block the proposed $45 billion merger of Comcast and Time Warner Cable. Consumer Watchdog has also pointed out to the U.S. Department of Justice the substantial antitrust issues the proposed deal raises. However, the Commission should exercise its authority to reject the merger simply because it is not at all in the public interest.

Since its acquisition of NBCUniversal, Comcast has become a major content provider. By controlling the means of distribution via cable TV or the Internet, Comcast will be able to unfairly promote its content over the content of other providers, limiting choice for consumers. With its deal with Netflix to expedite the popular service's video, there are already troubling signs that Comcast is using its power unfairly to hurt content providers and limit consumers' choice on the Internet. The Netflix deal also breaches commitments Comcast made when that merger was approved to maintain 'net neutrality. It is a clear that Comcast's pledges are quickly ignored in the face of a drive to increase profits and that behavioral conditions do not work.

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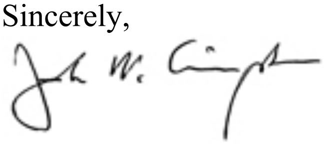
The consolidation of the two largest cable television providers would create a media juggernaut that would stifle completion and hurt consumers who would ultimately pay higher prices for even worse service. The companies are trying to argue that they don't directly compete in any cities. That is not the issue. Rather the concern is the share of the national cable TV market the behemoth would control, which would be substantial. The merged company would cover 16 of the largest 20 metropolitan regions for multichannel video programing distribution including the crown jewels of New York and Los Angeles.

The proposed merger poses even greater problems with Internet access. In most of the markets they serve, Comcast and Time Warner Cable are the primary providers of high-speed broadband Internet access. Because in each of these markets the companies are effectively local monopolies, they are able to charge more for slower broadband service than is the case in other developed nations around the world.

A final demonstration that the deal is not about improving service for consumers, is the outrageous $80 million "golden parachute" Time Warner Cable CEO Robert D. Marcus will receive if the deal is completed. The deal is about lining the pockets of shareholders and executives. It clearly is not in the public interest. Imposing behavioral conditions would be an insufficient remedy. Consumer Watchdog calls on you to reject the proposed merger.

Sincerely,



Privacy Project Director