October 6, 2017

**Re: Comment regarding proceeding 17-214, Media Bureau Seeks Comment on Status of Competition in the Marketplace for Delivery of Video Programming**

To whom it may concern:

I am submitting below my previously published opinion piece for comment in response to proceeding 17-214. I believe the AT&T/Time Warner merger will have a serious and negative impact on consumers and consumer choice. As a leader in the conservative movement, I am also concerned that this merger, if approved, would prevent conservative voices and ideas from being heard across a number of media platforms.

Thank you, in advance, for your consideration of my thoughts and concerns regarding this important issue.

Ken Blackwell

Former Domestic Policy Advisor to the Trump Presidential Transition Team

One thing that is clear from President Trump’s first several months in office is that powerful corporate media giants like CNN, the New York Times and others have become hopelessly more biased against him than ever.

Unfortunately, the power of these biased corporate media giants may only get more powerful under the pending mega-merger of AT&T and CNN’s parent company, Time Warner. President Trump said last year that this deal would put “too much concentration of power in the hands of too few” and promised to block it; yet there’s been dangerously little attention paid to a corporate marriage that would make two massive global media conglomerates even bigger.

Grassroots conservatives remain hopeful that President Trump remembers his campaign pledge to stop this deal.

Many conservatives have warned about the dangers of this merger because of that concentration of power.  My friend Larry Kudlow, a noted free market champion who would normally be loath to call for government to stop a merger, has raised significant concerns about one company controlling cable distribution and key channels.  “In other words, owning the content and owning the pipes may go too far,” Larry said.

These companies already have tremendous power and influence – and a combination of the two raises major concerns. Aside from CNN, Time Warner and its honchos in Hollywood own the top premium cable network in HBO, the second-biggest movie studio, and highly watched cable networks like TBS and TNT. AT&T, meanwhile, just bought satellite company DirecTV – making it the biggest TV provider in the country. Add in its wired Internet business and the fact that it serves 134 million cell phone customers, and the picture is clear that these companies shouldn’t get to join forces.

AT&T and Time Warner will use corporate buzzwords like “synergy” and “vertically integrated” to argue that this deal is good for average Americans. In reality, it would give AT&T even more control over our TV and Internet experiences. For example, if it owned HBO, AT&T could also refuse to offer competing movie channels on an equal basis.  As the owner of the distribution they could use their power to make their own channels more attractive and available to consumers and they could effectively choose not to carry any content that competes with Time Warner’s broad slate of content.

Here’s the worst part: Since Time Warner owns CNN, this could have hugely perilous effects on our news environment and your ability to choose what to watch. It’s not hard to see how AT&T could discriminate against other channels – including conservative voices – by putting them in a bad spot on your channel line-up and trying to make their shows hard to find.   The AT&T/Time Warner combo could easily ensure that CNN is more accessible to consumers than competitors like Fox – to further increase CNN’s power to push their liberal agenda.

Or, just like with entertainment networks, they could basically refuse to even carry smaller conservative channels like One America News, Newsmax, or The Blaze. DirecTV, in fact, only agreed to carry OAN and Newsmax this year after they announced their merger and thought it would be worth trying to buy off potential critics – and they still don’t carry The Blaze. CNN’s actions are already, in a word, deplorable – the mainstream media doesn’t need any help in limiting access to viewpoints it doesn’t like.

This stuff matters. As the media remains obsessed with ginned up controversies and coverage intended to undermine President Trump and conservative principles in general, there is not nearly enough awareness of the threat this deal poses – and how important it is that President Trump keep his promise to block, as he put it, deals like this that “destroy democracy.”