



Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, NW
Washington, DC 20554

Re: *Modernizing the E-rate Program for Schools and Libraries*, WC Docket No. 13-184
Promoting Diversification of Ownership in the Broadcasting Services, MB Docket No.
07-294
*Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Transfer
Control of Licenses and Authorizations*, MB Docket No. 14-57
Protecting and Promoting the Open Internet, GN Docket No. 14-28
Framework for Broadband Internet Service, GN Docket 10-127

Dear Ms. Dortch:

On September 22, 2014, Hannah Sassaman, Todd Wolfson, and Bryan Mercer (Media Mobilizing Project); Siobhan Reardon, Jim Pecora, Donald Root, Scott Pinkelman, Harry Fishburn (Free Library of Philadelphia); Donna Frisby-Greenwood (John S. and James L. Knight Foundation); Sam Reed, Tyana Gutzmore, Tyteana Gutzmore (The U School); Andrew Buss (City of Philadelphia Office of Innovation and Technology); Sara Lomax-Reese (900AM-WURD); Brigitte Daniel (Wilco Electronic Systems Inc.); Gretjen Clausing (PhillyCAM); Ron Blount (Unified Taxi Workers Alliance of Pennsylvania); Barry Kaufmann (Common Cause Pennsylvania); Tom Earle (Liberty Resources); Dan Denvir (Philadelphia City Paper); Phil Napoli (Rutgers University) (collectively, "the participants"), met with Chairman Tom Wheeler; Maria Kirby, Legal Advisor to Chairman Wheeler; Michael Janson, Legal Advisor, Wireless Telecommunications Bureau; and Eric Feigenbaum, Director of Outreach and Strategy, Office of Media Relations, at two roundtable discussions in Philadelphia.

The participants spoke generally about the state of media and diversity of ownership, particularly minority ownership, in Philadelphia, and the difficulty in providing internet access in a city where low income people have disproportionately low adoption of broadband internet service. In the context of this, many participants pushed the Chairman to do everything in his power to bring diversity to broadband markets, including blocking or conditioning the proposed Comcast and Time Warner merger. Participants spoke about the need for strong Net Neutrality protections for poor and working people, including people with disabilities and immigrants. Leaders at the Free Library of Philadelphia and the City's Office of Innovation and Technology praised the Commission for its actions modernizing the E-Rate program for schools and libraries, while pushing the Chairman and colleagues to do everything in their power to innovate in how institutional broadband could serve communities with low broadband penetration.

Specifically, participants described the status of consolidation in the broadcast, print, and broadband and cable media and telecommunications systems in Philadelphia. Phil Napoli described consolidation in Philadelphia in the context of national trends and patterns, and pushed for more research to establish the impact of current consolidation on minority ownership of media and telecommunications outlets. With major cable and broadcast outlets such as Comcast, CBS and Clearchannel owning multiple multi-platform outlets in the city, independent cable/telecom and broadcast operators Brigitte Daniel of Wilco Electronic Systems and Sara Lomax-Reese of black talk radio station 900AM-WURD struggle to compete and survive. They and others spoke to the unserved communications needs of myriad communities in Philadelphia, that include a majority of minority and low-income population groups resident in the City.

Gretjen Clausing, who hosted the first section of the meeting at PhillyCAM, discussed the vital service they provide, and how difficult it was to establish their public access television channel, and to maintain it as the City approaches its next Comcast franchise negotiation. Donna Frisby-Greenwood, program director/Philadelphia at the John S. and James L. Knight Foundation, highlighted their support of the new media business incubator at Interstate General Media as a way to create more new media companies in Philadelphia, and to push traditional media outlets to adopt new media strategies. Todd Wolfson, of Media Mobilizing Project and Rutgers University, described how Comcast's interference in collaborative public/private applications for Broadband Technology Opportunities Program (BTOP) resources to break Philadelphia's digital divide hampered plans to build an alternative broadband network in Philadelphia.

Bryan Mercer, co-Executive Director at Media Mobilizing Project, described the challenges his own mother met when she looked for competitive, affordable internet access in Philly, and asked how thousands of low income community members fare in a consolidated communications market. Thomas Earle, as the CEO of Liberty Resources, a federally funded Center for Independent Living, stated his support for strong net neutrality protections for people with disabilities in Philadelphia. Daniel Denvir, an investigative reporter at City Paper, described how consolidation in the media markets in Philadelphia limits Philadelphians' access

to the deep investigative reporting that holds powerful institutions in Philly and in our state capitol of Harrisburg accountable.

Barry Kaufmann, a longtime advocate and the director of Common Cause Pennsylvania, described the personal challenges he and his neighbors met in trying to get cable access in his rural community only about 20 miles west of the state capitol, Harrisburg. Ronald Blount, president of the Unified Taxi Workers Alliance of Pennsylvania, described the challenges of connecting to isolated cab drivers, primarily first generation, working class poor immigrants; he related how hard they worked to help 1000 of the 5000 cab drivers in Philadelphia into healthcare provided through the Affordable Care Act; mainly relying on word of mouth instead of broadcast news or internet access, as broadcast news rarely covered the issues of drivers, and many had little to no access to the internet.

Multiple participants described in detail the low level of success that Comcast has enjoyed with its Internet Essentials program, a discount internet service for low income families that it offered as a condition on its previous merger with NBC Universal. Media Mobilizing Project noted that the FCC should consider strongly how to support municipalities and community organizations working in their own communities to break the digital divide.

Common Cause made clear its position that the merger is inimical to the public interest and that no set of conditions could ameliorate its harms. Moreover, without ceding that the pending transaction should be approved, any conditions must address merger-specific harms. In this case, whatever the strengths and weaknesses of the Internet Essentials program may be, they are tangential to the problem of granting Comcast intolerable levels of gatekeeper control across the media and telecommunications ecosystem.

In a second conversation focused on E-rate services in libraries and schools, Library staff and officials described the deep need in communities citywide for internet services, training, and access. They discussed different initiatives, like mobile internet labs and the potential of sharing connectivity further into communities, to individuals who don't often come to libraries. Noting the innovative success of the KEYSPTS program, funded by the Broadband Technology Opportunities Program, both Media Mobilizing Project and the Office of Innovation and Technology encouraged the Chairman to explore partnerships with other agencies to break the digital divide. Students and their teacher from the U School described how integral communications access inside schools and at home is to securing a strong education in Philadelphia.

Participants were grateful to PhillyCAM, the Free Library of Philadelphia, and to the John S. and James L. Knight Foundation for providing support for the event.

This letter is being filed in accordance with Section 1.1206(b) of the Commission's rules.

Sincerely,

Hannah Sassaman

Policy Director

Media Mobilizing Project

/s/

cc: Chairman Tom Wheeler
Maria Kirby
Michael Janson
Eric Feigenbaum