

September 26, 2014

By Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

**Re: Applications of Comcast Corporation and Time Warner Cable Inc.,
Charter Communications Inc. and SpinCo, for Consent to Assign
Licenses or Transfer Control of Licensees, MB Docket No. 14-57**

**Applications of AT&T, Inc. and DIRECTV for Consent to Assign
Licenses or Transfer Control of Licensees, MB Docket No. 14-90**

Dear Ms. Dortch:

TV One, LLC (“TV One”) respectfully submits these comments in response to the Media Bureau’s Public Notice, DA 14-1383, released on September 23, 2014, in the referenced proceedings. Launched in January 2004, TV One serves 57 million households, offering a broad range of real-life and entertainment-focused original programming, classic series, movies, and music designed to entertain, inform and inspire a diverse audience of adult Black viewers. TV One is owned by Radio One, the largest radio company that primarily targets Black and urban listeners; and Comcast Corporation.

The Public Notice asks whether the Joint Protective Orders adopted in the proceedings are sufficient to protect the highly sensitive business information of programmers, like TV One, that are parties to affiliation and distribution contracts with the transaction parties. Those contracts, along with descriptions of certain key terms thereof and correspondence and other items relating to the negotiation of the agreements, are subject to production by the transaction parties pursuant to information and data requests issued by the Commission in the proceedings.

TV One notes that it is not a party to either of the proceedings. Like other programmers that do business with the transaction parties, it has not been asked to authorize disclosure of its agreements with the transaction parties, and it has not been given an opportunity to object to any third-party review of those agreements. It is deeply concerned -- especially as an “innocent bystander” -- that its agreements not be subject to the possibility of even inadvertent disclosure to outside counsel and consultants who are intimately involved in negotiating price

Marlene H. Dortch, Secretary

September 26, 2014

Page 2

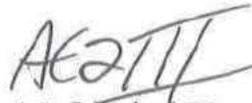
and other terms of distribution agreements on behalf of TV One's competitors and other distributors with which TV One does business.

TV One agrees with other programmers -- and with the implication of the Public Notice -- that the Joint Protective Orders do not ensure that the confidentiality of its highly sensitive contract materials will be preserved. TV One would not object to delivery of these materials to the Department of Justice for review by the Commission, as we understand routinely occurs with documents submitted to the Department pursuant to the Hart-Scott-Rodino process in transactions subject to review by both agencies. But the availability of these materials in the Commission record for review by third parties, including outside counsel and consultants, poses an unacceptable risk that information contained in those materials will influence the conduct of negotiations in commercial transactions involving both TV One and its competitors, with the corresponding risk of competitive and public interest harms.

TV One therefore believes that its affiliation and distribution agreements with the transaction parties, together with any descriptions of the terms of those contracts and related negotiation materials, should be produced only to the Department of Justice and made available for review only by Commission personnel. In the event the Commission concludes it must refer to any such materials in its written decisions in these proceedings any references should be anonymous and all key business terms, including pricing information, should be redacted.

Thank you for your consideration of these comments. Please contact us if you have any questions.

Respectfully submitted,



Alfred C. Liggins, III
President/CEO

cc: Vanessa Lemmé, Vanessa.Lemme@fcc.gov
Ty Bream, Ty.Bream@fcc.gov
William Dever, William.Dever@fcc.gov
Jim Bird TransactionTeam@fcc.gov
Best Copy and Printing, Inc., FCC@BCPIWEB.COM