

**National Association of Telecommunications Officers and Advisors
Alliance for Community Media
American Community Television**

April 27, 2015

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

Re: Amendment to the Commission's Rules Concerning Effective Competition and Implementation of Section 111 of the STELA Reauthorization Act, MB Docket No. 15-53

Dear Ms. Dortch:

Coming on the heels of Comcast's announcement that it is dropping its bid for Time Warner Cable, we find it ironic that the Commission seeks to completely upend the effective competition petition process. Many opponents of the Comcast/Time Warner merger had argued that the deal *could* be bad for American consumers and that it *could* lead to higher prices. But we know that the Commission's proposed rule in this proceeding *will* hurt consumers and *will* lead to higher prices since no basic service tier of any cable provider – big or small – will be subject to local rate regulation.

A number of reasonable steps have been proposed that could streamline the current effective competition process and which, if adopted, would satisfy the congressional mandate of Section 111. The Commission should narrow the scope of this proceeding and ensure that any action it takes does not impose any additional burdens on local governments or subjects consumers to higher prices.

Sincerely submitted,



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