



May 8, 2015

Marlene S. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street
Washington DC 20554

Re: MB Docket No. 15-53

Dear Ms. Dortch:

I write to express the concern of UCC OC Inc. that the Commission might take action to radically de-regulate the cable industry via a proceeding that is designed to take procedural steps rather than to undertake a major shift in policy. We support the comments filed by Public Knowledge and Common Cause in this docket. We urge the Commission, at a minimum, to slow down this proceeding to give the implications of any decision of this import sufficient time to be fully explored.

While Congress has directed the FCC to "establish a streamlined process for filing of an effective competition petition ... for small cable operators, particularly those who serve primarily rural areas,"¹ the Commission has proposed to adopt a blanket presumption that the cable industry is competitive.² At a time the cable infrastructure has become an essential input for households subscribing to broadband service, and the Commission has just recognized the critical importance of competition and access in its Open Internet proceeding, it is troubling that this docket could take such a radical step in such a short time-period with little public comment.

UCC OC Inc. has long cared about localism and access to diverse content at affordable prices. The current structure of the media marketplace structures that limit American access to independent and diverse voices. Because video is increasingly being offered over broadband, the evolving video marketplace does not support a blanket deregulation of cable. The cost of broadband and cable access are an important part of this debate.

We are also concerned about this proposal's impact on localism. Local communities, where they have preserved their rights to review rates and other matters relating to their franchise authority, should retain that power. Local communities should maintain their rights to make determinations about such important infrastructure. To the degree that the Commission is seeking ways to minimize its administrative burden, the Commission should explore alternative options that do not deprive local communities of their legal authority.

UCC OC Inc. hopes that the Commission will slow down this proceeding and solicit broader comments from a wide variety of impacted parties, and ultimately decide not to take this sweeping deregulatory step.

Sincerely,

A handwritten signature in black ink, appearing to read "Cheryl A. Leanza", is positioned below the word "Sincerely,".

Cheryl A. Leanza
Policy Advisor

¹ STELA Reauthorization Act of 2014, Pub. L. No. 113-200, § 111, 128 Stat. 2059 (2014).

² Amendment to the Commission's Rules Concerning Effective Competition; Implementation of Section 111 of the STELA Reauthorization Act, *Notice of Proposed Rulemaking*, FCC 15-30 (rel. March 16, 2015).