

consumer action

Education and advocacy since 1971

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

May 8, 2015

Re: *Notice of Proposed Rulemaking* in MB Docket No. 15-53

Dear Ms. Dortch:

Consumer Action submits this letter expressing concern that the Commission's proposed rule changes in the effective competition proceeding could lead to higher bills for cable TV subscribers, especially low-income subscribers who rely on basic cable for access to local TV channels. We are also concerned that these proposed rule changes will unfairly burden local franchise authorities (LFAs) that may not have the financial wherewithal to challenge the Commission's blanket presumption that all communities now enjoy a competitive pay TV market.

We agree with the Commission that the video marketplace has changed dramatically since the Cable Act was first implemented in 1992. However, there are reasons to be wary of any rule changes that would massively deregulate an industry that has shown little regard for its customers. Cable costs have skyrocketed in the last decade, much faster than the rate of inflation. A recent Harris Poll¹ again confirmed that cable companies are among the lowest rated for customer satisfaction. We fear the action you propose could give major cable companies even more power to disadvantage consumers.

We strongly encourage the Commission to, at the very least, slow down and carefully consider how these rule changes could affect consumers of all stripes – not just those that can afford to spend \$200+ per month for pay TV. While the Commission has a tight deadline to comply with the Congressional mandate to streamline the effective competition process for small cable operators – an effort we could support if done correctly – there does not appear to be any reason to rush through the much larger proposals presented in this proceeding, especially the proposals to strip LFAs of their existing authority and to shift the burden to LFAs to prove that competition is not yet adequate in certain communities.

Sincerely,



Linda Sherry
Director, National Priorities

¹ "2015 Harris Poll RQ Summary Report," Harris Poll (Feb. 2015), at 8, *available at*: http://www.harrisinteractive.com/vault/2015%20RQ%20Media%20Release%20Report_020415.pdf.