



October 8, 2015

The Honorable Tom Wheeler, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 15-149

Comments in Support of Application of Charter Communications,
Inc., Time Warner Cable Inc. and Advance/Newhouse Partnership
for Consent to Transfer Control of Licenses and Authorizations

Dear Chairman Wheeler:

I am writing on behalf of ONE World Sports (“OWS”) in support of the proposed merger among Charter Communications, Inc. (“Charter”), Time Warner Cable Inc. (“Time Warner”) and Bright House Networks, LLC (“Bright House”), through which these entities will merge into New Charter. We strongly believe that the merger will serve the public interest.

OWS is an English-language multiplatform sports network featuring exclusive best-in-class sporting events, live from around the globe. The network was created to fulfill American sports fans’ growing demand for global sports. A June 2015 nationwide study by Frank N. Magid Associates revealed that 40% of the respondents are highly likely or likely to have an interest in global sports categorically and 49% are likely to watch OWS specifically. OWS delivers live and exclusive coverage of some of America’s most popular sports played outside the USA – basketball, baseball, golf and ice hockey – plus sporting events with the largest global following, including soccer and cricket. Significantly, OWS serves various ethnic minorities by providing programming of particular interest to those communities. Thus, OWS’s

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telecasts include England National Cricket Team's international home matches (of particular interest to Americans of Indian, Pakistani and Sri Lankan descent), the Yomiuri Giants (a highly popular and legendary Tokyo baseball team), Kontinental Hockey League (the premier hockey league of Eastern Europe and Russia), Champions Hockey League (a hockey league covering countries in Central Europe), Chinese Basketball Association (pre-eminent men's professional basketball league in Asia), OneAsia Golf Tour (a series of golf events across the Asia-Pacific region including the Australian Open of which number one ranked Jordan Spieth is defending champion), the New York Cosmos (North American Soccer League), and best-in-class competitions in table tennis and badminton from around the world (which is of particular interest to the Chinese communities). Further, OWS televises season-ending championships for the Kontinental Hockey League, Champions Hockey League and Chinese Basketball Association, along with post-season playoffs featuring the Yomiuri Giants and the Asian Football Confederations 32 match Asian Cup.

In today's rapidly changing cable and satellite environment independent programmers like OWS face particularly unique challenges to grow and succeed as they operate with limited scale and resources. Large and powerful programming groups leverage tying and bundling practices that force multiple networks on MVPD's that results in capturing a disproportionate share of scarce bandwidth and programming dollars. I It is therefore essential to the survival of independents like OWS that the MVPDs are supportive and responsible partners. OWS distribution executives have worked closely with Charter over many years and have found Charter to be an exemplary professional organization that treats independent networks fairly and responsibly. Specifically, Charter has been an important and supportive

partner of OWS in bringing to market programming of specific interest to ethnic minorities. We are confident that Charter will continue to operate in this manner after the proposed merger.

Serving Underserved Communities

Charter's support of OWS and its efforts to bring programming of special interest to American ethnic communities is consistent with its general business practices. Thus, Charter has consistently demonstrated its commitment to serving diverse populations by offering ethnic packages for the Hispanic and Asian communities. For example, Charter currently offers customers the largest tier of Hispanic programming available, including El Rey, Fusion, Fuse and NBC Universo. Through the proposed merger, these packages – which promote diversity and inclusion – will be made available to millions of additional customers.

Charter has also consistently shown its commitment to serving rural communities with global sports and Spanish language programming. For example, within four years after the close of the merger, New Charter has committed to build out one million line extensions of its networks to homes in its franchise areas, including many in currently unserved areas.

According to the latest census data, 25.6% of households do not have internet access. These homes are disproportionately from low-income and minority communities. New Charter will seek to bridge this digital divide by significantly expanding Bright House's low-income broadband option ("Connect2Compete"), which partners with schools, libraries and non-profits to provide affordable internet service, deep discounts on internet-capable devices, and innovative digital literacy training. New Charter will build upon Bright House's Connect2Compete program by making a broadband offering available with faster speeds and broader eligibility, while continuing to offer the service at a significant discount. New Charter

will begin making the offer available within six months after the merger closes and will offer it across the New Charter footprint within three years of closing.

Consumer-Friendly and Internet-Friendly Business Practices

Charter's billing practices are consumer-friendly and do not include many of the practices for which the industry has been criticized. For example, Charter does not include data caps or usage-based billing. Charter does not use contracts with early termination fees, and does not charge modem lease fees. If the merger is approved, we expect that Charter will continue its pro-consumer approach. Therefore, as a result of the merger, millions of additional viewers will be able to enjoy OWS's high-quality global sports programming without concern for data caps or usage-based billing. Charter's transparent and fair billing and business practices are especially valuable when serving ethnic minorities whose means and abilities to interpret complex billing statements are limited. Further, OWS provides a live network stream through its Watch ONE World Sports app for authenticated subscribers viewing on mobile devices; Charter's lack of data caps will therefore enable their subscribers to enjoy OWS on the go without fear of excessive data fees.

In addition, some MVPDs charge fees to OVDs that wish to connect directly to the MVPD's broadband network in order to stream their online content more effectively. Some OVDs believe abuses regarding this practice have sometimes impeded the best service to consumers, and undermined the open Internet envisioned by the FCC. Significantly, Charter has made a three-year commitment not to charge interconnection fees at all.

Commitment to Quality and Content of Its Products

Charter has done the utmost to ensure that OWS's programming is available to all of its subscribers, and has done so by offering the OWS network to every one of the cable systems that Charter operates. Not all providers operate this way; many of them let each local market decide if and when they want to carry a particular channel, even when the provider has negotiated an overall agreement with the independent network. This approach enables OWS to grow more rapidly while reducing sales expenses. As a result of this commitment to launch in every market, OWS has confidence that New Charter will significantly expand its availability by launching in every Time Warner and Bright House market.

OWS has several MVPDs who have elected to air the network only in standard definition format. In contrast – although requiring greater bandwidth consumption and not required by contract – Charter offers OWS in high definition in every market, which sports fans clearly find superior to standard definition. The merger will ensure that this commitment to quality will be expanded throughout the enlarged New Charter footprint.

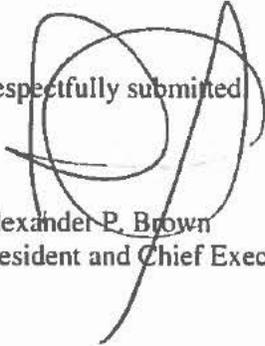
Comments that the FCC has received from other independent networks have confirmed what OWS has experienced firsthand – namely, that Charter has been an excellent partner and a supporter of diversity in programming. As an example, Charter was among the first providers to launch and market OWS after it rebranded itself and relaunched as a global sports network in 2014.

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Conclusion

For the reasons stated above, OWS strongly supports the proposed merger, which will be beneficial to consumers and independent networks and consistent with the public interest.

Respectfully submitted



Alexander P. Brown
President and Chief Executive Officer

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