

CreativeFuture

Creativity. Innovation. Tomorrow.

19 February 2016

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

RE: Proceeding No. 15-149

Dear Chairman Wheeler:

CreativeFuture (CF) is a coalition of 450 companies and organizations and more than 70,000 creative individuals encompassing film, television, music, and book publishing. CF promotes the value of creativity, expanded digital access to legitimate content, and the fundamental right of creatives to determine how their works are distributed. We pursue these initiatives by forging voluntary agreements with other members of the digital creative ecosystem – including major advertisers and agencies.

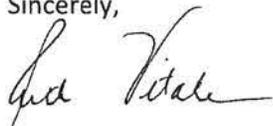
CF supports the principles of the recent submission by the National Music Publishers' Association (NMPA) urging the Commission to require, as a condition of the proposed merger of Charter, Time Warner Cable, and Bright House Networks, a commitment from the combined entity to implement clear and consistent policies aimed at addressing copyright infringement, including participation in the Copyright Alert System (CAS). CAS is a highly successful example of cross-industry cooperation between content creators and internet service providers (ISPs) to protect creative content.

Time Warner Cable has been an important participant in CAS since its launch three years ago, and if the combined entity participates in CAS, CAS will be strengthened by the additional support. If, however, the combined entity declines to participate, it will significantly weaken CAS, thus harming the ISP community that is working cooperatively to address piracy, the creative professionals who benefit from that cooperation, and ultimately the public interest.

The public interest is best served when the entire internet ecosystem respects the rights of those who create content. The Commission has recognized this many times, including in its recent Open Internet order that finds reasonable measures such as CAS to be fully consistent with the public interest.

Accordingly, we encourage the Commission to require that the merged entity commit to, at a minimum, participation in the Copyright Alert System and pledge to work with copyright owners to address incidents of copyright infringement that use the merged entity's network.

Sincerely,



Ruth Vitale
Chief Executive Officer