

**Before the
Federal Communications Commission
Washington, DC 20554**

Applications for Consent to the)
Transfer of Control of Licenses)
and Section 214 Authorizations)
from MediaOne Group to)
AT&T Corp.,)

CS Docket No. 99-251

**COMMENTS OF
GLOBAL WIRELESS CONSUMERS ALLIANCE**

The Global Wireless Consumers Alliance (Alliance) welcomes the opportunity to comment on the Proposed Merger of AT&T and MediaOne. The Alliance is a coalition of consumer, disability, small business, public safety, crime victims and public interest organizations. Over 30 different organizations have affiliated with the Alliance with membership in all 50 states.

None of these organizations have an economic stake in the outcome of the Federal Communications Commissions (FCC) eventual decisions in this matter. The Alliance does have an interest in good public policy and believes that this is a matter that the FCC is correct to evaluate if there are benefits to the public if the merger where completed.

- **The AT&T-MediaOne merger will harm consumers and violate the subscriber caps:**

We are concerned that this merger could allow AT&T to impose discriminatory access on a critical means of communications – the broadband Internet through the cable television network. Current policy has allowed the Internet to flourish because all Internet Service Providers have had open access to all the communications networks. AT&T should not be allowed to control a major conduit to the Internet – the cable television network. This would greatly harm consumers.

If the merger between AT&T and MediaOne is allowed to be completed, the combined company will control close to 60 percent of all cable subscribers in the country. This will violate the FCC cap on the percentage of homes that one company can control (required by Congress in 1992). This puts the conglomerate in a position to use market power to

control programming and potentially abuse consumers by raising prices without fear of competitors forcing them to keep cost low. The FCC must be diligent and aggressive in enforcing the cap that states that no company can hold more than 30% of the country's combined cable and satellite television subscribers. The FCC must prevent AT&T from growing so large that it can control the market and potentially raise rates without controls or true competition eventually abusing consumers.

- **Allowing AT&T-MediaOne merger to bust the cap will hurt consumers:**

If the cap is ignored and this merger approved, AT&T will control access to the high-speed Internet through its closed access cable modem service. They will control monopoly cable service for millions of Americans, and be able to exert near-monopoly power over cable programmers. Consumers will continue to pay soaring cable rates. They will see the access to the high-speed Internet controlled by a monopoly provider that stifles competition and innovation and increases prices.

- **The AT&T-MediaOne merger should be rejected:**

If the FCC fails to follow its own cable ownership rules and block this merger, AT&T will complete their quest to dominate and control the market. This cannot stand and only the FCC can stop this anti-consumer merger. The Alliance urges that the FCC should follow its own cable ownership rules and block this merger immediately.

Respectfully submitted,

Jim Conran
President