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

electronically filed

RE: Letter of the American Cable Association in support of Mediacom Communications Corporation's Reply Comments in MB Docket No. 02-77

Dear Ms. Dortch:

I submit this letter on behalf of the American Cable Association ("ACA") to support Reply Comments filed by Mediacom Communications Corporation ("Mediacom") on February 4, 2003 in MB Docket No. 02-77.¹ Like Mediacom, ACA opposes the relaxation of broadcast station ownership limits.²

Mediacom, the nation's eighth largest cable company and an ACA member, is the leading MSO primarily focused on serving small and mid-sized markets. ACA shares Mediacom's concerns over unprecedented consolidation in the media industry. All ACA members serve similar communities as those served by Mediacom – small, rural communities. The average ACA member serves

¹ *In the Matter of 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules*, MB Docket No. 02-77. In its Reply Comments, Mediacom also stated "our experience has been shared by the other members of the American Cable Association."

² *In the Matter of 2002 Biennial Regulatory Review – Review of the Commission's Broadcast Ownership Rules*, MB Docket No. 02-27, ACA Reply Comments (filed February 3, 2003) ("Media Ownership Reply Comments").

7,000 subscribers. More than half of ACA's members serve less than 1,000 subscribers. All members face the challenges of owning, operating, and upgrading broadband networks in lower density markets.

ACA fully supports Mediacom's Reply Comments, in particular the points raised that have direct bearing on smaller cable operators and their rural customers. As described in Mediacom's Reply Comments, concentration of programming and broadcast assets in the hands of a few conglomerates has already resulted in the following:

- Rising cable rates, as network owners and major affiliate groups impose annual rate increases for cable programming;
- Price discrimination against rural and smaller market consumers, as programming rates decrease with response to the size of the markets; and
- Reduction in the ability of independent cable operators to effectively compete against DBS, which already enjoys structural cost and other advantages under federal law and the FCC's rules.

Mediacom argues that if the FCC relaxes its media ownership rules, these harmful effects will be magnified as the huge media companies that now control broadcast television and cable programming grow even bigger and more powerful. ACA members face the broadcast and programming behemoths every day and can attest to the points articulated by Mediacom.

To fully evaluate the consequences and public interest harms of media ownership concentration, the Commission must carefully study Mediacom's excellent filing and act on both Mediacom and ACA's proposals.

Yours sincerely,

/s/

Matthew M. Polka