

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Applications for Consent to the)	MB Docket No. 05-192
Assignment)	
and/or Transfer of Control of Licenses)	
)	
Adelphia Communications Corporation,)	
(and subsidiaries, debtors-in-)	
possession),)	
Assignors,)	
to)	
)	
Time Warner Cable Inc. (subsidiaries),)	
Assignees;)	
)	
Adelphia Communications Corporation,)	
(and subsidiaries, debtors-in-)	
possession),)	
Assignors and Transferors,)	
to)	
)	
Comcast Corporation (subsidiaries),)	
Assignees and Transferees;)	
)	
Comcast Corporation, Transferor,)	
to)	
Time Warner Inc., Transferee;)	
)	
Time Warner Inc., Transferor)	
To)	
Comcast Corporation, Transferee.)	

COMMENTS OF IBC WORLDWIDE, LTD.

IBC WORLDWIDE, LTD. ("IBC") herewith submits its comments with respect to the subject transfer proceeding.

On May 18, 2005, Adelphia Communications Corporation ("Adelphia"), Time Warner Inc. ("Time Warner") and Comcast Corporation ("Comcast") (collectively "Applicants") submitted joint applications to the Commission seeking consent to transfer control of and/or assign various Commission licenses and authorizations pursuant to Section 214

and Section 310(d) of the Communications Act of 1934, as amended.¹ By Public Notice, released June 2, 2005, the Media Bureau set the dates for filing comments and petitions to deny as July 5, 2005, and set the date for filing responses to comments and oppositions to the petitions as July 20, 2005.² On June 21, 2005, Applicants filed supplemental information on the systems that will be transferred as a result of the transactions and on pre-and post-transaction subscriber counts. On June 24, 2005, the Commission pursuant to Sections 4(i), 4(j) and 5(c) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 154(j) and 155(c), and Sections 0.61, 0.283, and 1.46 of the Commission's rules, 47 C.F.R. §§ 0.61, 0.283, and 1.46, extended the date for filing comments and petitions to deny in MB Docket No. 05-192 until July 21, 2005, and extended the date for filing responses to comments and oppositions to petitions to August 5, 2005.

Background

IBC is in the business of developing, programming and transmitting Interactive Broadband Channels, a new communications medium which is a convergence of television, the computer and the Internet. Such channels provide IBC a content channel that is fully devoted to satisfying a specific interest of a viewer. Each channel can provide specialized content to fulfill a special interest of the viewer. Specific channels are being and designed to fulfill any of many varied interests such as Music, Sports, Mystery, Sciences, etc. Each channel can present a limitless array of special elements designed specifically for that particular interest.

The IBC Interactive Broadband Content Channels are available on a round the clock schedule -7 x 24 x 365, and are fully interactive so the viewers can see what they want, when they want and where they want. The use of such interactive Internet channels gives access to a worldwide community of people with the same interests, with full translation technology to communicate. Such channels have an uncluttered environment without commercials or intrusive audio/visual advertising, while providing the ability to view the sponsor's available advertising at the viewer's own leisure.

In essence, IBC through its Interactive Broadband Content Channels is able to use the Internet to include the following elements: (1) a substantial video archive, available 24 x 7 x 365, that will be full motion and full screen, (2) chat rooms with translation capability, (3) interactive live interviews with specialists and experts, (4) special interactive games, (5) latest news and information related to the viewer interests, (6) live links to compatible worldwide organizations and (7) specially produced segments. Interaction with the Channels is an important element. It is possible to give the viewer total control over the content. Also, each Channel can have its own specific content suitable for its audience, e.g. trade professionals, students, educators and special interest groups such as the Medical Community.

¹ See 47 U.S.C. §§ 214, 310(d).

² Public Notice, DA 05-1591, released June 2, 2005.

IBC is able to use Interactive Broadband Content Channels to finally realize the true potential of the Internet as a communications medium.

The internet was created and is free worldwide, except for its transmission mechanisms used to provide access to this incredible resource. In the US, consumers regularly pay to access the Internet via dial-up or DSL connections through facilities provided directly or indirectly by telephone carriers or cable companies.

Cable companies and phone companies are utilizing the internet to drive their customer sales to the home by giving the end user a faster way to access and use the Internet. The Internet, a free venue of data and visual programming, has become an unparalleled income driver, producing ever increasing profits for these companies. For example, Comcast's last quarterly profits were up 300%, mostly contributed from their cable modems.

These cable companies and the phone companies have become the gatekeepers controlling Internet access, just as the cable companies have been the gatekeepers of content on cable television. Gatekeepers are in a position to decide who gets on, and have the ability to shut users off. There is no need for this Internet gatekeeping to continue with respect to the cable industry.

Cable Internet Ready (CIR) Settop Converters

As a result of the advances of technology, today it is possible to make every cable box Internet accessible. With the insertion of a simple chip, every cablebox can become Internet ready and allow TV set reception of all visual and audio data distributed via the Internet.

IBC's basic position is that if cable companies such as Adelphia, Time Warner and Comcast want to utilize this worldwide medium to make ever increasing profits from the Internet, a free medium, then they should be mandated to provide a channel on the cable for the Internet access over television, in the same manner computers, and wireless do. The advantages to be gained from such a Cable-Internet-Ready (CIR) settop box are substantial including the following:

- The CIR will open the Internet to low income families that have television access available.
- The CIR will provide a low cost entree point for senior citizens.
- The CIR will provide a venue for an ever-expanding program production industry seeking access for their content.
- The CIR will provide immediate access to in-home television sets for the Homeland Security Agency, obviating the need to construct a new communications network to access the country's 85+ million cable TV homes.
- The CIR will expand and extend all types of communications – local, regional, national and international.

CIR Transfer Condition

The advantages offered by CIR equipped cable systems are truly unprecedented. Consequently, IBS respectfully requests that all licenses and permits to be transferred pursuant to applications under review in this proceeding be conditioned on the following requirement:

Within 12 months of the grant of the subject transfer applications, all settop converters used by the Transferee(s) shall Cable Internet Ready, i.e. converters shall be so equipped to provide at least one channel position for direct reception of the Internet by its customers.

Respectfully submitted,

IBC WORLDWIDE, LTD.
1466 Broadway, Suite 905
New York, NY 10036

By /s/ Fank Liberman

Frank Lieberman
Its President.

Dated: July 20, 2005