

I am very concerned about the proposed merger between Comcast and NBCU. The transaction is not good for America. It will create a media goliath that will dominate what Americans view on television, cable, and over the Internet. Our democracy needs more media diversity, not less.

A Comcast-NBC combination will also lead to the loss of good jobs. Comcast/NBC debt will increase by approximately \$8 billion after this transaction. To pay for the debt, the company has two choices: cut jobs or raise cable prices. Either way, consumers and workers lose.

This is an all too familiar pattern in the media sector. Media companies over-leverage to pay for a merger, cut jobs to improve their balance sheets, only to discover that they do not have enough staff to produce quality news and entertainment programming. This creates a vicious cycle of declining audience share, less revenue, and even more cost-cutting.

I am also concerned about Comcast's track record on labor issues. Comcast has a long history of aggressive action to eliminate worker organization at companies that it acquires. Where workers try to form a union, Comcast has fired and retaliated against union supporters.

There is already too little competition in the video marketplace. Cable rates are escalating at three times the rate of inflation. A Comcast/NBC combination would have added incentive and ability to engage in anti-competitive practices that would increase cable rates.

After the merger, Comcast will own NBC's premier programming. It will have the ability to bundle its less desirable cable channels with must-have NBC programming. This forced bundling will raise other video providers' costs, which translates into higher cable rates.

Today, some companies are trying to compete with incumbent cable operators. They are investing significant resources to build their networks. This merger would provide Comcast/NBC with the incentive and ability to raise the prices it charges new entrants for must-have NBC and sports programming, effectively blocking or limiting competition, investment, and jobs that accompany those efforts.

I am also concerned about the impact of this merger on the emerging online video market. The Internet allows consumers to access the video content of their choice, unmediated by the pre-packaged bundles of the cable company.

The Comcast-NBC merger has the potential to bring this to a halt. A combined Comcast/NBC could limit consumers' online access to NBC content, or it could charge consumers higher prices to access that content unless they are cable subscribers. This is the TV Everywhere model that Comcast and NBC have already begun to deploy, which forces internet customers to buy cable

packages in order to see content online.

In the biggest TV Everywhere trial, NBC provided access to live streaming and full replay of Olympic events only to consumers who are cable subscribers.

These actions protect the cable-channel business platform at the expense of new video entrants, and devalue the broadband investment of competitive companies. The end result is that companies will invest less in broadband deployment, put less fiber in the ground, and hire fewer people. There will be less progress to achieve the goals of the National Broadband Plan.

I urge the FCC carefully to scrutinize this transaction and to ensure that it does not reduce video competition, consumer choice and jobs.