

The following comments regarding the proposed sale of NBC Universal to Comcast are respectfully submitted for the consideration of the Commission.

The public interest would be strongly disserved by allowing this sale to proceed. Allowing multiple television station licenses, two broadcast TV networks, and multiple cable networks to be placed under common ownership with the largest operator of cable TV systems in the country is a sure formula for increasing vertical integration and reducing competition within the television industry.

Furthermore, approval of this transfer would create an inherent conflict of interest in Comcast's operation of the broadcast stations and networks, since there will be a strong temptation to move high appeal programming from the free broadcast networks over to paid cable channels in order to maintain overall penetration rates for pay TV services. There will also be an additional conflict of interest when it comes to negotiating carriage rights for the broadcast stations and cable networks with pay TV operations that compete directly with Comcast's cable systems (ie, Verizon's FIOS, AT&T's U-Verse, DirecTV, and DISH Network).

It has been suggested that the FCC can remediate these very real concerns simply by placing conditions on the sale, but it seems unlikely that it will be possible to effectively enforce any conditions on the sale once that sale has been consummated without some very complex enforcement mechanisms being put in place. And in the end, any attempts to impose elaborate conditions on the sale are simply recognition of the fact that this sale IS NOT IN THE PUBLIC INTEREST and should not be approved.

Therefore, I petition the FCC to reject the instant sale application and refuse to grant transfer of the licenses for the NBC Universal broadcast properties to Comcast.

Thank you for your consideration.