

Cross ownership rules of broadcast TV stations and newspapers must be strengthened to protect the public interest not weakened any further. The record in the FCC proceeding on Media Ownership begun in 2009-2010 should reflect that too much vertical consolidation is a bad thing for consumers, competition and the public interest. Furthermore, too much consolidation in the media can be harmful for the future of the Internet.

In the case of Comcast NBC they now have unprecedented media and Internet power to favor their own content, discriminate against competitors as they tried to do with Bloomberg TV and Tennis Channel which led to complaints by those networks with the FCC which those channels have rightly won and against competing online video services like Netflix using unequal and discriminatory data caps that don't apply to Comcast's XFINITY TV but apply to rival streaming services.

I urge the FCC to thus not weaken cross ownership rules any further but strengthen them and not allow harmful horizontal mergers either that are bad for consumers, competition and the public interest. In the next two weeks I will file a submission for the record incorporating some if not all of the documents I submitted to the FCC ITS 2010 Media Ownership Review proceeding (09-182) to this proceeding regarding cross ownership of broadcast TV stations and newspapers and perhaps a letter to the FCC requesting the rules be strengthened. For now just accept this statement of record and all comments included in my current filing.