



November 1, 2012

Chairman Julius Genachowski
Commissioners Mignon L. Clyburn, Jessica Rosenworcel, Ajit Pai, and Robert M. McDowell
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: FCC-12-123A1, MB Docket No. 12-68 et al.

Dear Chairman Genachowski and Commissioners Clyburn, Rosenworcel, Pai and McDowell:

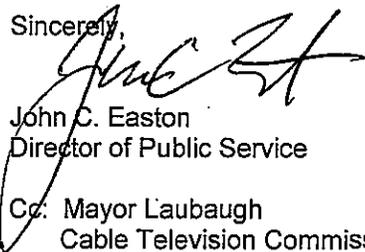
The recent decision of the Federal Communications Commission to permit the prohibition on exclusive contracts to sunset is causing the City of Wadsworth Cable Television Commission to be wary of any negative repercussions for City of Wadsworth cable customers.

Until recently, a cable company's competitors, such as satellite broadcasters, could buy the content of programming from the owners of the programming, albeit at prices that may be difficult to negotiate, but the programming could be purchased. Wadsworth Cable customers have been denied programming in the past, regardless of price; and, we now have a higher potential for such denial in the future, as a result of allowing these FCC program access rules to expire. I am attaching the assets of some cable operators, showing ownership of channels and other assets. As you can see, much of the entertainment in cable television is owned by a relatively few companies. With the expiration of the FCC rule governing such purchases, competitors will have to file individual complaints if they feel a cable operator is unfairly denying them access to a channel. We are cautiously optimistic about this move which would help safeguard systems like ours, in spite of the expiration of the current rules. We are also encouraged that the FCC has adopted a Further Notice of Proposed Rulemaking to consider proposals by the American Cable Association on ways to ensure that the program access rules may be effectively utilized by a buying group, such as the National Cable Television Cooperative.

We hope you will join us in monitoring the changes in this process and will consider any amendments, should the need arise. We are mindful of consequences to our own system, as a result of the sunset of the exclusive contract prohibition and appreciate the FCC's six month deadline for tackling any complaints and resolve to place the burden of proof in disputes over channel access on to the cable operators. Our Wadsworth Cable subscribers have experienced the anxiety of cable disputes which put them in danger of losing the channels they enjoy. In our attempt to hold down costs, stalled negotiations with media companies have frequently found us in a position of having to notify customers that a channel may no longer be available. Other cable operators and satellite broadcasters have seen their customers lose programming for periods of time while disputes are resolved. We recognize that it would be devastating to the existence of Wadsworth Cable to experience these same types of programming losses, during any extended complaint reviews.

We appreciate your continued attention to this and other issues affecting the residents of Wadsworth. We will certainly keep you apprised of further developments regarding these changes and look to you for support of additional safeguards for our cable system.

Sincerely,


John C. Easton
Director of Public Service


Bob Parmelee
Chairman, Wadsworth Cable Television Commission

Cc: Mayor Laubaugh
Cable Television Commission
American Cable Association

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Data

Top 25 Multichannel Video Programming Distributors as of Mar. 2012 1 - 25

Operating Metrics

Availability

Investments in Infrastructure

Value

Other Industry Data

Cable Advertising Revenue

Cable Industry Revenue

Number of Cable Headends

Top 25 Multichannel Video Programming Distributors as of Mar. 2012

Top 25 Cable Programming Networks

Rank	MSO	BasicVideoSubscribers
1	Comcast Corporation	22,294,000
2	DirectTV	19,966,000
3	Dish Network Corporation	14,071,000
4	Time Warner Cable, Inc.	12,653,000
5	Cox Communications, Inc.1	4,756,000
6	Verizon Communications, Inc.	4,353,000
7	Charter Communications, Inc.	4,341,000
8	AT&T, Inc.	3,991,000
9	Cablevision Systems Corporation	3,257,000
10	Bright House Networks LLC1	2,079,000
11	Suddenlink Communications1	1,250,000
12	Mediacom Communications Corporation	1,059,000
13	CableOne, Inc.	622,000
14	WideOpenWest Networks, LLC1	460,000
15	RCN Corp.1	333,000
16	Knology Holdings	256,000
17	Atlantic Broadband Group, LLC	254,000
18	Armstrong Cable Services	239,000
19	Midcontinent Communications	229,000
20	Service Electric Cable TV Incorporated1	217,000
21	MetroCast Cablevision	169,000
22	Blue Ridge Communications1	168,000
23	WaveDivision Holdings, LLC1	159,000
24	General Communications	142,000
25	Buckeye CableSystem1	133,000

1 contains estimates from SNL Kagan

Time-Warner

Television: Warner Brothers Television Group, Warner Brothers Television, Warner Horizon Television, CW Network (50 percent stake)

Cable: TBS; TNT; Cartoon Network; truTV; Turner Classic Movies; Boomerang; CNN; HLN; CNN International; HBO; Cinemax; Space; Infinito; I-Sat; Fashion TV; HTV; Much Music; Pogo; Mondo TV; Tabi; CNN Español

Entertainment: Warner Brothers; Warner Brothers Pictures; New Line Cinema; Castle Rock; WB Studio Enterprises, Inc.; Telepictures Productions, Inc.; Warner Brothers Animation, Inc.; Warner Home Video; Warner Premiere; Warner Specialty Films, Inc.; Warner Brothers International Cinemas

Other: Warner Brothers Digital Distribution; TMZ.com; KidsWB.com

Comcast

Television: NBCUniversal; 24 television stations and the NBC television network;

Cable: Telemundo; USA Network; SyFy; CNBC; MSNBC; Bravo; Oxygen; Chiller; CNBC World; E!; the Golf Channel; Sleuth; mun2; Universal HD; VERSUS; Style; G4; Comcast SportsNet (Philadelphia), Comcast SportsNet Mid-Atlantic (Baltimore/Washington, D.C.), Cable Sports Southeast, Comcast SportsNet Chicago, MountainWest Sports Network, Comcast SportsNet California (Sacramento), Comcast SportsNet New England (Boston), Comcast SportsNet Northwest (Portland, Ore.), Comcast Sports Southwest (Houston), Comcast SportsNet Bay Area (San Francisco), New England Cable News (Boston), Comcast Network Philadelphia, Comcast Network Mid-Atlantic (Baltimore/Washington, D.C.); the Weather Channel (25 percent stake); A&E (16 percent stake); the History Channel (16 percent stake); the Biography Channel (16 percent stake); Lifetime (16 percent stake); the Crime and Investigation Channel (16 percent stake); Pittsburgh Cable News Channel (30 percent stake); FEARnet (31 percent stake); PBS KIDS Sprout (40 percent stake); TV One (34 percent stake); Houston Regional Sports Network (23 percent stake); SportsNet New York (8 percent stake) iN DEMAND; Music Choice (12 percent stake);

Online Holdings: MSNBC.com (50 percent stake); Hulu (32 percent stake); DailyCandy; iVillage; Fandango

Telecom: Clearwire Communications (9 percent stake)

Cablevision

Television: News 12 Networks;

Cable: AMC; WE tv; IFC; Sundance Channel, MSG Varsity; Rainbow Media Holdings (Fox Sports Net); IFC Entertainment; Rush HD

Media: Bresnan Cable

Cox

Cable: Travel Channel

News Corporation

Television: 27 television stations and FOX Broadcasting Company (FOX Network, MyNetworkTV); FOX News Radio Network; FOX News Talk Channel;

Cable: FOX News; FOX Business; FSN (12 regional sports networks); FX; SPEED; FUEL TV; Fox College Sports; Fox Movie Channel; Fox Soccer Channel; Fox Soccer Plus; Fox Pan American Sports; Fox Deportes; Big Ten Network; National Geographic U.S.; Nat Geo Adventure; Nat Geo Music; Nat Geo Wild; Fox International Channels; Utilisima; Fox Crime; NEXT; FOX History & Entertainment; the Voyage Channel; STAR World; STAR Movies; NGC Network International; NGC Network Latin America; LAPTIV; Movie City; City Mix; City Family; City Stars; City Vibe; the Film Zone; Cinecanal; Elite Sports Limited; BabyTV; STAR India; STAR Taiwan; ESPN STAR Sports; Shine Limited

Online Holdings: Hulu.com (32 percent minority share)

Telecom: Satellite: BSkyB (39 percent minority share); SKY Italia

Tribune

Television: 23 television stations

Cable: Food Network (30 percent stake); WGN America; CLTV Chicagoland;

Entertainment: Tribune Entertainment

Viacom

Cable: Viacom Media Networks; MTV, VH1, CMT, Logo, Nickelodeon, Comedy Central, TV Land, Spike TV, Tr3s, BET and CENTRIC (160 channels total)

Disney/ABC

Television: ABC television network

Cable: ESPN, the Disney Channel, SOAPnet, A&E and Lifetime; the History Channel (42 percent stake); Lifetime Movie Network (42 percent stake); the Biography Channel (42 percent stake); History International (42 percent stake); Lifetime Real Women (42 percent stake); Live Well Network (42 percent stake)

Entertainment: Touchstone, Miramax and Walt Disney Pictures; Pixar Animation Studios; Marvel Entertainment

Washington Post Co.

Television: 6 television stations

Telecommunications: Cable ONE, Inc.

Hearst Corporation

Television: 31 television stations

Cable: A&E (42 percent stake); the History Channel (42 percent stake); the Biography Channel (42 percent stake); Lifetime (42 percent stake); the Crime and Investigation Channel (42 percent stake); Cosmopolitan TV; ESPN Networks (20 percent stake); ESPN Radio (20 percent stake); Current (minority stake); Reed Brennan Media Associates

Survey: TV Everywhere strikes gold during Olympic coverage

Mon, 08/13/2012 - 3:14pm

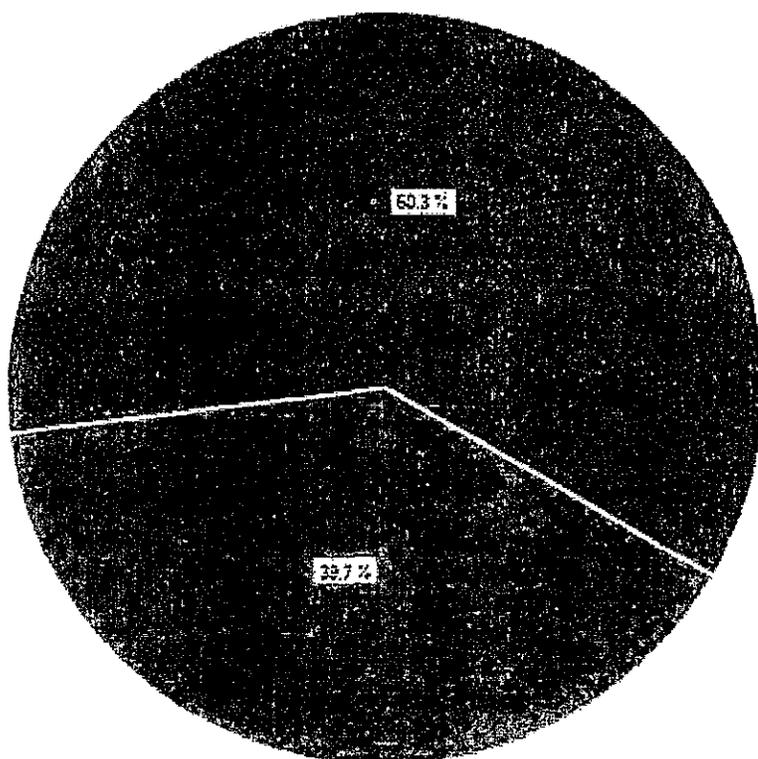
Mike Robuck

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NBCUniversal delivered more than 100 million video streams during the recent London Olympic Games, and the almost across-the-board coverage of the events further underscored the value of TV Everywhere services.

According to a survey by the National Inflation Association (NIA), nearly 10 million pay-TV subscribers in the United States authenticated themselves on their laptops, iPads and iPhone devices to access Olympic coverage by NBCUniversal in the first 10 days of coverage. During the same timeframe, NBCUniversal offered 45 million live streams of Olympic events.

Were you one of the nearly 10 million pay-TV subscribers to so far authenticate your pay-TV subscription for access to NBC's Olympic TV Everywhere coverage?



Yes 39.7%
No 60.3%

The Olympic Games were a high water mark for TV Everywhere services because of the amount of live streams that were offered to authenticated customers and the number of service providers, including Comcast, Time Warner Cable, Cox Communications, Charter Communications, Cablevision, Bright House Networks and Mediacom, to name a few, that were serving them up through deals with NBCUniversal.

A few basic tenets for TV Everywhere services rang true in the National Inflation Association's survey. The first was that 74 percent of the respondents said that TV Everywhere services, such as the Olympic coverage, made them more likely to keep their pay-TV subscriptions in the future due to the value that they received at no additional cost. So TV Everywhere services do have the ability to reduce video subscriber churn, which is

something cable operators can hang their hats on to partially offset the loss of basic video subscribers over the past few years.

Even if the Olympic streams weren't free as part of subscribers' existing TV tiers, 42 percent of the users said they would pay at least \$15 for access, with 14 percent of users saying they would pay \$60 or more.

The authentication process for TV Everywhere services no longer frustrates users. Of the 1,513 who responded to the NIA's survey from Friday through Sunday's closing ceremony, 40 percent said that they successfully authenticated their Internet-connected devices. Of those that authenticated themselves, 58 percent rated the authentication process a 10, with 10 representing the most easy and convenient and 1 being the most difficult and confusing. Half of 1 percent of the authenticated users rated the authentication process a 1.

The NIA, which recently bought a 2 percent stake in TV Everywhere vendor Synacor, said that 68 percent of the users felt that TV Everywhere services "could offer a tremendous ground-floor investment opportunity."

One of the driving forces for subscribers accessing the live streams was NBCUniversal's decision to delay showing marquee events until the evening broadcast instead of showing them live during the day, according to the survey. When asked what motivated them to use NBCUniversal's Olympic TV Everywhere service, the largest response came from 49 percent of users who wanted to watch the events live before they aired on TV.

Pay-TV companies received low marks for not advertising their TV Everywhere services, with 65 percent saying their providers almost never advertised the TV Everywhere offerings. On the plus side, 42 percent said they planned to explore their TV Everywhere options after seeing NBCUniversal's Olympic coverage.

Keeping in mind that the NIA has a vested interest in TV Everywhere services, its survey also broke down which browsers worked the best for the live streams, how the devices performed and highlighted the need for better advertising on TV Everywhere offerings.

While TV Everywhere offerings date back to 2009 with Comcast and Time Warner, the Olympic streams were further proof that **TV Everywhere services are poised for a watershed year in 2012.**

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