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The FCC should presume that a Comcast/Time Warner merger will have anti competitive effects that dominate any claimed efficiency justifications. Such a merger would dramatically increase the concentration in the cable internet market, and that is true even though the two companies do not have many overlapping geographical markets. Small geographic areas are not the relevant consideration when defining this issue. These companies' contracts are national, their services are national, and most importantly the effects of the concentration that would result from a merger are national. Each company will face substantially less threat of competition through expansion and entry by a competitor, thus harming end-user internet consumers.

Further, the behemoth that would result from a merger would have market power, on a national level, allowing anti competitive behavior vis-a-vis content providers. With the threat of cable companies forever casting aside net neutrality, this power would be particularly pernicious.

For these reasons I think the FCC should presume that the merger would have net anti competitive effects. The agency should balance any stated competition enhancing effects and operational efficiencies while mindful of the serious harm this merger would enable.