

I have serious concerns about the Comcast Time Warner Cable merger's effect on competition and innovation online. Furthermore, I fear the Comcast Charter transaction in which Comcast has agreed to divest some of its subscribers to Charter to get regulatory clearance for its TWC deal also contains some unpleasant and anti competitive aspects. According to the Comcast Charter deal for example, in the state of Massachusetts Charter's business will be swallowed by Comcast. Charter will file to transfer ownership of its licenses in that state to Comcast and Charter will stop offering service in that state. Cable companies have always formed territories to avoid competing against each other. This is wrong and needs to be looked into.

Below you will find details on this egregious aspect of the Comcast Charter deal which should be blocked. Even if regulators are willing to let Comcast divest some existing subscribers to Charter (and willing to let TWC divest also) they should not permit Charter to hand away its business in states like Massachusetts to Comcast.

Charter Communications Inc. could be leaving Massachusetts next year, if an agreement with Comcast Corp. is approved by federal and state officials.

"All assets of Charter in Massachusetts will become Comcast. Charter will carry on until the transaction is complete," said Timothy G. Murnane, vice president of external affairs for the Greater Boston region for Comcast's north central division.

He spoke Tuesday at an Oxford selectmen's meeting.

The complex Comcast/Charter transaction, announced in April, raises questions about the possible impact on cost and service.

Mr. Murnane said, "There will be no effect whatsoever" on prices, at least at first, though new choices, equipment and services will be offered.

The transfer of all 182,699 Massachusetts Charter customers in 53 communities to Comcast, which already has 1,488,659 customers in 246 Massachusetts communities, is one of several results of a [merger](#)

between Comcast and Time Warner Cable, which Comcast is purchasing for \$45.2 billion.

To gain approval from the Federal Communications Commission, Comcast agreed to divest itself of 3.9 million customers so that its "post-merger subscriber total" will be less than 30 percent of the total national multichannel video programming distributor subscriber base, according to Comcast.

As a third party to the agreement, Charter agreed to acquire 1.4 million current Time Warner Cable subscribers, and Charter and Comcast each agreed to transfer approximately 1.6 million customers to each other, with Charter gaining customers in the South and West and Comcast picking up subscribers in the Northeast, including Massachusetts.

In Worcester, the city has been notified of the agreement and officials are reviewing the transaction documents. John Hill, a spokesman for the city, said the transaction would not change the city's cable license, which was renewed with Charter in 2013 for 10 years.

Worcester's Cable Advisory Committee will hold a hearing at 6 p.m. Aug. 5 in City Hall to give the public a chance to comment.

According to the state Office of Consumer Affairs and Business Regulation, cities and towns have 120 days to act on transfer applications. In considering such applications, cities and towns can take into account the new cable operator's management experience, technical expertise, financial capability and legal ability to operate a cable system.

They cannot require the incoming operator to provide additional services, rebuilds or upgrades as a condition of granting approval of the transfer.

At the Oxford meeting, Gerald Buckley, senior government affairs manager at Comcast, said, "We're very excited about this transaction. We have a long-standing relationship with Massachusetts."

He said that Charter customers have been watching advertisements for Comcast's "best-in-class technology and service," and now will have access to it.

"We are proud of our localism, as large as we are."

Comcast is the largest cable company in the United States.

Thomas P. Cohan, director of government relations for Charter, said, "This fall, Charter will go all digital," which should help with the transition to all-digital Comcast in the spring.

Mr. Murnane said it was impossible for him to answer specific questions about customer impact or operations, since anti-trust laws prevent Comcast from seeing Charter's physical plant "until the legal transfer of closure."

But he said, "We have every intent to offer all benefits our current customers have to our new customers. Whatever contractual obligations are (with Charter), we will honor them."

He said contracts vary by community, but would include any senior citizen or veteran discounts, local access channel payments and other obligations already in place.

When asked what would happen to customers with a "[charter.net](https://www.charter.net)" or other charter email account, he said it was too early to say, but customers would be given ample time to make any switch to a new email address should that become necessary.

Mr. Murnane did not say whether current Charter employees would be hired by Comcast, but added, "We don't have an army waiting at the

border. Once we own the company, we will look at operations to see what's best for customers."

He said a six-month review by the FCC is underway, with a "probable closing in the first quarter" of 2015, and he expected a smooth transfer from Charter to Comcast with "no time when TV won't work."

As part of that transfer, Comcast and Charter are meeting with selectmen and city and town managers in all existing Charter communities, asking for a transfer of license from Charter to Comcast.