

OPPOSITION TO REQUEST AGAINST EXTENSION OF TIME

A member of the general public hereby opposes the “Joint Opposition To Request Extension of Time” by Comcast Corporation., Time Warner Cable Inc., and Charter Communications Inc., filed mere days before the August 25th, 2014 deadline for initial comments on the “Applications of Comcast Corporation and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Applications”.¹

I ask that the FCC consider that many constituents have not had the proper information or the access to consider the transfer of licenses and applications of the Comcast Corporation., Time Warner Cable Inc., and Charter Communications Inc. (collectively, “Applicants”). The sites with in-depth information on the FCC proceedings are often complex and require an erudition in telecommunications and law that many Americans find difficult to comprehend. The majority of those living in the US have a high school degree or an associates degree, rarely with a specialization in the field of telecommunications or law.² In addition, many Americans use the Internet through sources not situated in their home and may not have had the opportunity to comment yet.³ The opposition, “Applicants”, cite FCC articles, few of which reach the mainstream of media news outlets. The outlets that do contain viable, in-depth information on the proceedings require paywalls, an amenity that most Americans do not have. Still, there are other sources where Americans find their information, including Youtube, Twitter, Television, and journals, newspapers, and magazines that are not as thorough in their investigations. More time is needed for the public to become aware of not only the commenting period, but the full details of the review.

¹ See Comcast Corporation., Time Warner Inc., and Charter Communications Inc., Joint Opposition To Request Against Extension of Time, MB Docket No. 14-57 (August 20, 2014) (“Opposition”).

² Educational Attainment in the United States (2012). <https://www.census.gov/hhes/socdemo/education/data/cps/2012/tables.html>

³ “Digital Nation: Expanding Internet Usage”, U.S. Department of Commerce. http://www.ntia.doc.gov/files/ntia/publications/ntia_internet_use_report_february_2011.pdf.

In regards to there being no precedent for the extension: if this is true, it is not a reason to deny the extension of time. The FCC Commission does not need to uphold the actions of past commissions. It does not serve the needs of the “Applicants” but the public interest, public concerns, diversity, and speech.⁴ As the “Applicants” argue themselves, “no cataclysmic ‘domino effect’ will likely result from a delay of two-weeks time”. A two-week extension hardly derails the review of their applications, and as there are no known precedents of this extension, it is unclear whether it would “prime the pump” for more extension applications. In addition, the “Applicants” do not state in detail the “significant disruptions” that would occur under those circumstances.

Finally, there are recent developments that may affect public opinions on the proceedings. The recent agreement between Time Warner Cable and Netflix sets a harmful, industry standard that the FCC seeks to review, in addition to the merger between the “Applicants”.⁵ Those whose opinions may have changed due to the Netflix and Time Warner Cable dealings may want to comment on the proceedings.

In regards to the previously stated reasons, I ask that you deny the request against the extension of time.

Sincerely,

L.A. Acevedo,

Constituent and concerned member of the public.

⁴ “The public interest standard of our governing statute is broader – for example incorporating concerns about universal access, public safety, competition, consumer protection, as well as localism, diversity and speech.” Remarks of Jon Sallet (Jan. 22, 2014). <http://www.fcc.gov/document/remarks-jon-sallet-fcc-acting-general-counsel-stanford-ca>.

⁵ “Netflix Inks Streaming Deal with Time Warner Cable”, The Hill. <http://thehill.com/policy/technology/215569-netflix-inks-streaming-deal-with-time-warner-cable>.