



August 22, 2014

Chairman Tom Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O'Rielly  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

*RE: MB Docket No. 14-57*

Dear Chairman and Commissioners:

When Comcast announced plans to acquire Time Warner Cable (TWC) earlier this year, many industry critics argued that it would have too much power over consumers, content providers, and others in the media industry. These critics speculated about the possible risks while ignoring the very real advantages this merger would bring to millions of customers in the TWC footprint, such as faster Internet service and more diverse programming.

Comcast's merger with TWC means a robust video experience for more Americans. TWC customers will benefit from Comcast's industry-leading X1 platform, which provides unprecedented choice, control, and access to content on a wide array of IP-connected devices.

Because Comcast and TWC operate in different communities, no customer will see a reduction in competition for Internet, cable, or telephone service. They are merely replacing one cable and Internet provider for another, a swap that will benefit our local communities through access to faster Internet speeds, more programming choices, and Comcast's innovative programs. For instance, Comcast plans to expand its *Internet Essentials* initiative, which has already brought low-cost broadband to over a million low-income Americans, to current TWC communities.

As the EVP of Content Distribution at Ovation -- the only national, multi-platform network offering arts and cultural programming-- I can address the claims raised by some that this merger will have an adverse effect on independent programmers. Ovation has existed since the mid-90s, but was relaunched in 2007. Much of our network's success is due to our outstanding business relationship with Comcast, which has added millions of homes to the network's overall distribution -- over 3 million in the last three years, including new carriage in key markets such as Miami, Atlanta, and Chicago. Comcast also added Ovation to its Xfinity on Demand service in 2012, increasing our network's VOD reach to more than 25 million US households, and offers the same Ovation programs to their customers through their various TV Everywhere platforms. In addition, Comcast has been a key partner in numerous local arts education initiatives we have supported, including providing free museum admission and creating awareness of cultural events at community and national levels.

As the nation's only arts network, Ovation believes strongly that every household -- whether in an urban center or a rural community -- deserves access to the arts. Accordingly, Ovation is still seeking full carriage on Comcast given their strong presence in the country's top markets. It's

critical that we ultimately secure the broadest carriage in the nation's largest cultural centers in order to have full access to those viewers who are most inclined to value arts programming.

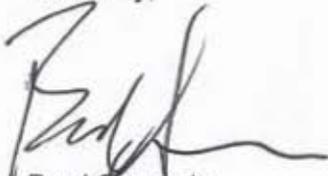
In fact, Comcast has the best record of any pay-TV provider in launching independent networks like Ovation, as well as many minority-owned channels, such as TV One. In conjunction with its NBCUniversal transaction, Comcast made an unprecedented commitment to carry 10 new, independently owned and operated cable networks, and moved quickly into an all-digital platform, at great expense, to free up channel space for the next generation of innovative independent programmers. And unlike other cable MVPDs, Comcast hasn't yet dropped a cable network in a carriage fee dispute.

Over the years, Comcast has proven to be an important distributor of Ovation's quality programming and consistently negotiates fairly. Comcast pays competitive rates to independent programmers like us, and are willing to grow distribution when warranted. In turn, we've provided high-quality, non-duplicative programming focused on art, artists, and artistic storytelling. Given our long-standing relationship, we look forward to reaching full distribution on Comcast, allowing Ovation to invest even further in our brand and original programming.

All in all, I believe the Comcast/TWC merger would bring positive change to the pay-TV and broadband industry. Customers will see no reduction in competition, but will benefit from more innovative products and services. Programmers, especially independent programmers, will have more assurances and opportunities to maintain and/or gain carriage.

Mr. Chairman and Commissioners, thank you for ensuring that independent voices like ours are heard.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brad Samuels', with a long horizontal flourish extending to the right.

Brad Samuels  
Executive Vice President of Distribution, Ovation