



August 23, 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:

I write on behalf of the Greater Philadelphia Hispanic Chamber of Commerce, a not for profit organization formed by nearly 600 members, 7.5 full time staff and a board of directors of 18. We submit these comments in favor of Comcast Corporation's acquisition of Time Warner Cable.

We believe that the Federal Communications Commission should rely on market forces in considering the Time Warner Cable transaction because it is the supply and demand factors what ensures us that consumers are served, and we see no clear evidence that a proposed combination of these companies would harm the public. Comcast and Time Warner Cable are not direct competitors, and the proposed transaction will not limit or lower consumer choice. We find that this merger would enhance the public's ability to access high quality Internet, cable and video services through the latest technology enhancements available to the public, across all income levels.

Latinos are highly mobile and surpass the general population in wireless and mobile technology regardless of income class. The Comcast Time Warner transaction would enable and enhance access to incredible programming for the Latino community in two of the largest Latino markets in the nation. We support companies that enhance Latino quality of life as Comcast does.

We've heard people say that Comcast will shut down competitor websites or somehow act as a gatekeeper over what we see on television or online if this transaction is approved. That sort of misinformation makes no sense at all and in fact, it is used against educated consumers. Being in Comcast's home market, we've learned first-hand that the company is a broadband provider that knows its customers would leave if the company blocked or controlled access to online content – and so it is not doing these things. The critics have not explained why an increase in its subscriber base would somehow lead to illegitimate activities that do not occur today. And as a business organization, we ask how it would benefit Comcast to anger its own customers by unfairly limiting the ways they use the service? If Comcast customers can't access the websites or shows they want, they aren't going to remain customers for very long.

Some critics argue that the new company will be too large, but we have seen no explanation of how size alone could hurt consumers. However, Comcast competitors include Verizon, AT&T, and Dish – three large, powerful companies highly regarded across markets. It makes no sense to limit Comcast's growth when it competes against larger companies such as Google with higher



market values and substantially more customers. Another example is Wal-Mart; very big, but it offers very low prices and benefits consumers a great deal. In the Latino retail sales community, Wal-Mart also adds great value to small business owners facing economic and language challenges by allowing them to keep neighborhood jobs in small stores while serving food desert customers.

We believe that Comcast would have an opportunity to boost Time Warner's markets, particularly low to moderate markets such as some Latino markets in New York and Los Angeles, by retaining existing jobs and creating new jobs while allowing them to train individuals to access new careers in technology as they have done with other mergers. Having experienced Comcast for many years, the one thing that Comcast is not known for is to leave people without jobs; yet well-known at developing professionals. While the supposed harms from this transaction seem flimsy or nonexistent, the promised benefits are concrete and real.

We are told the company has committed to spending hundreds of millions of dollars a year on enhancing service in new territories. That is good for Internet and video users; however, we see incredible value as this kind of investment fuels neighborhood growth and the broader business economy.

The members of the Greater Philadelphia Hispanic Chamber of Commerce are local businesses, and we believe a larger Comcast that reaches places like Charlotte (an emerging Latino market) and New York (a mature Latino market, primary to Philadelphia Latinos) will offer a valuable new choice for business customers. Right now, the options are limited for multi-office enterprises that need business Internet service and want to rely on only one provider. Extending Comcast's footprint to serve businesses with locations in New York, Los Angeles, and other major cities would open up an attractive option. A Comcast that reaches those markets would be a boon to competition and it would likely produce cost savings for businesses in those new markets.

We lastly want to mention that, Comcast has been a leader in corporate civic responsibility in the Philadelphia region and many communities across the nation. We can attest that Comcast will be a great partner and friend in any community they seek to serve. Perhaps because its business model requires such a large on the ground presence in neighborhoods and communities, the company seems to understand the value of civic investment and local partnerships, and its list of charitable works is long and impressive. These activities are real and of great benefit to the communities involved.

We thank you for the opportunity to express our views on this important subject to the Latino community, to our nation.

Truly,

Varsovia Fernandez
President & CEO