



August 25, 2014

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

Re: Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Transfer Control of Licenses and Authorizations, MB Docket No. 14-57

Dear Chairman Wheeler and Commissioners:

Outside Television supports the merger of Comcast and Time Warner Cable. We believe it will create new distribution opportunities for independent programmers who target smaller but passionate niche audiences.

Outside Television is the only national programming network dedicated to the active outside lifestyle and the more than 141 million Americans who regularly participate in it. Based on Outside Magazine and the concepts behind its critically acclaimed brand, Outside Television embraces running, biking, skiing, sailing, surfing, kayaking and any other adventures involving wind, water, snow and terrain; as well as the full spectrum of people's lives who engage in them. We feature a strong lineup of nearly 50 original shows that tell the incredible stories of the globe’s most majestic natural landscapes and the fearless souls who dare to conquer them in the name of sport.

Outside Television is currently available in over 30 million homes through a variety of distributors. This broad carriage is largely due to Comcast’s decision to support and carry Outside Television as part of its original national launch in 2012.

Specifically, our network was established in mid-2010. From the start, Outside Television was steered by a seasoned leadership team featuring Emmy award-winning producers, former major sports league executives, and titans of the broadcast industry – all of whom recognized the unique opportunity that Outside Television’s programming concept could offer. We had a brand that enabled us to bring a near-instant audience to the systems that carried us, built a significant roster of original programming, and entered into key partnerships with sponsors. And we had truly compelling original content, shot in HD with the world’s greatest natural settings as our stage.

Although Comcast already carried a wide variety of sports programming, including NBC SportsNet and regional sports networks, Comcast saw that Outside Television could serve an untapped niche with tremendous upside. We signed an affiliation agreement with Comcast in late 2011 and launched in 2012, with rollout of the network to customers located within Comcast systems near America's coastlines, mountain ranges and the Great Lakes, where so many outside enthusiasts live. At year-end 2013, over 2.6 million Comcast customers were receiving Outside Television.

Comcast has shown that it is not only open to – but enthusiastic about – seeking out new, high quality independent programming that adds value to the choices it offers its customers. As an industry leader in the carriage of independent programming, Comcast has been a willing and valued partner of Outside Television. We are grateful for Comcast's past support and have high hopes for an even greater business relationship as the two companies continue to grow.

That is why Outside Television, as an independent programmer, is very interested in this transaction. If approved, Comcast will be able to entertain further distribution of our network in areas where Outside Television is not currently offered. An expanded Comcast footprint will give us the chance to grow our reach and extend our viewership. We urge the Commission to approve the transaction as quickly as possible.

Thank you for considering our views.

Sincerely,

A handwritten signature in blue ink that reads "Mark Burchill". The signature is written in a cursive style with some stylized letters.

Mark Burchill  
Chief Executive Officer