



August 25, 2014

Mr. Tom Wheeler
Chairman
Federal Communications
Commission
445 12th Street, SW
Washington, DC 20554

Re: MB Docket No. 14-57

I am the Executive Vice President and General Counsel of Starz (which includes Starz Networks), and I am writing in support of the proposed transaction between Comcast and Time Warner Cable. Starz Networks is a leading provider of premium subscription video programming through flagship networks STARZ and ENCORE, which showcase original programming and movies to U.S. multichannel video distributors (MVPDs), including cable operators such as Comcast and Time Warner Cable, satellite television providers, and telecommunications companies.

Starz Networks proudly airs more than 1,000 popular movies and original series such as *Outlander*, *Spartacus*, and *The Missing*. Combined, Starz Networks' STARZ and ENCORE have served over 55.9 million subscribers, making them the largest pair of premium flagship channels in the U.S. This success is in large part due to the relationship that Starz Networks has with Comcast.

Comcast first established a business relationship with Starz Networks in 1997, and has since proved a valuable and reliable partner. Among other things, in 2010 Starz and Comcast entered into a new affiliation agreement, which presented Comcast with even more flexibility in presenting Starz's programming, benefitting both Starz Networks and Comcast. This long-term agreement allows Comcast's STARZ and ENCORE subscribers to have access to Starz Online and Encore Online, each offering over 300 movies and episodes of original programming. As of December 2013, our relationship with Comcast alone accounted for at least 10% of Starz's revenue. Comcast has supported Starz Network's efforts to grow and expand, and the transaction between Comcast and Time Warner Cable will allow for even further growth of Starz Networks and other programming providers. For example, it is my understanding that the Comcast/Time Warner Cable transaction will enable Comcast to provide faster Internet speeds and other significant benefits. Starz Networks will directly gain from these advancements in Comcast services because they will allow millions of additional subscribers to have access to better, more reliable platforms on which to access our programs.

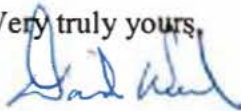
In addition, because Starz Networks is a global provider of video programming, diversity and acceptance are essential factors for us. As a longtime business partner, Comcast has not only

demonstrated acceptance of, but also promoted, diversity in both its programming content and other business practices. I understand that Comcast plans to even further expand its distribution of diverse networks, including ethnic programming, by launching four new minority-owned or managed networks plus an additional independent network. I believe Comcast is already the nation's largest cable provider of Spanish language programming packages, and offers Hispanic, South Asian, Filipino, and Brazilian packages as part of their existing Triple Plays, which provide other international programming, free international long distance calling minutes, and high-speed data access. Through these initiatives, among many others, Comcast greatly supports Starz Networks' global reach, an essential aspect of our network.

In conclusion, Starz Networks depends on its relationship with MVPDs to carry our programming, and Comcast and Time Warner Cable have been longstanding and reliable partners. For these reasons, Starz strongly supports approval of the transaction between these two companies.

Please feel free to contact me if you have questions or would like any additional information.

Very truly yours,

A handwritten signature in blue ink, appearing to read "David Weil", written over the typed name.

David Weil
Executive Vice President and General Counsel