

Dear President Obama and Members of Congress:

We represent a broad group of industry, labor and public interest organizations that are gravely concerned about Comcast's proposed acquisition of NBC-Universal. We believe that a merger of this size and scope will have a devastating effect on the media marketplace. It will result in less competition, higher consumer costs and fewer content choices. It also will give one company unprecedented control over innovative new media that offer news, information, entertainment and cultural programming through emerging technologies.

A combined Comcast/NBCU would control a major television network and film studio, the nation's largest cable company and its largest residential broadband provider. The merged giant would have strong incentives to discriminate against other multi-channel video providers in granting access to its wealth of programming, including all of its broadcast stations and "must-have" national and regional networks that air live or same-day sporting events, as well as the market power to enforce anticompetitive "bundling." The proposed deal could make it even harder for diverse and independent voices to find an audience, as Comcast would have the incentive to prioritize NBC channels and programs over others. Control of NBCU programming also would give Comcast the opportunity to prioritize its own online video products over those of its competitors – or sharply reduce online video distribution altogether – pushing independent producers out of the picture.

Comcast has proposed to voluntarily agree to a handful of commitments in an attempt to avoid the imposition of more effective, and competitively essential, conditions on this merger. While these "commitments" purport to address concerns about localism and program diversity, and would extend the current (and arguably ineffectual) program access rules to broadcast and HD programming, they are mere window dressing. Moreover, they do not mitigate the competitive danger of the vastly increased vertical integration that would result from a Comcast/NBCU marriage, and they do not address the competitive issues raised by the merged company's control over online video distribution – an increasingly important platform for television distribution. To prevent a disastrous impact on competition and consumer choice, any approval of the merger must include meaningful conditions that extend well beyond those previously imposed on less significant mergers.

The proposed deal raises the most basic antitrust and public policy issues for an administration that has declared both the importance of media diversity and an intention to be more vigilant against anticompetitive conduct and abuses of market power. We ask that you take a hard look at this merger and

take the necessary measures to prevent harm to both consumers and competition.

Signed,

American Cable Association

Center for Media Justice

Common Cause

Communications Workers of America

Concerned Women for America

Consumer Federation of America

Consumers Union

Free Press

Kids First Coalition

Media Action Grassroots Network

Media Access Project

Media and Democracy Coalition

Morality in Media

National Association of Independent Networks

National Consumer League

National Organization for Women

National Telecommunications Cooperative Association

Organization for the Promotion and Advancement of Small Telecommunications Companies

Parents Television Council

Public Knowledge

Satellite Broadcasting and Communications Association

Sports Fans Coalition

U.S. PIRG

Writers Guild of America East

Writers Guild of America West