

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Applications of ) MB Docket No. 14-57  
Comcast Corp. and )  
 )  
Time Warner Cable Inc. )  
 )  
For Consent Pursuant to Section 214 of )  
the Communications Act of 1934, as )  
Amended, to Transfer Control of )  
Subsidiaries of Time Warner Cable Inc. )  
 )

To: The Commission

**COMMENTS OF THE  
NATIONAL ASSOCIATION OF BROADCASTERS**

The National Association of Broadcasters (“NAB”)<sup>1</sup> submits this filing in response to the *Public Notice*<sup>2</sup> regarding the applications of Comcast Corporation (“Comcast”) and Time Warner Cable Inc. (“TWC”) (collectively, the “Applicants”) for consent to transfer control of TWC subsidiaries to Comcast, as well as with certain proposed divestiture transactions (the “Applications”).<sup>3</sup>

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<sup>1</sup> The National Association of Broadcasters is a nonprofit trade association that advocates on behalf of local radio and television stations and broadcast networks before Congress, the Federal Communications Commission and other federal agencies, and the courts.

<sup>2</sup> *Commission Seeks Comment on Applications of Comcast Corporation, Time Warner Cable Inc., Charter Communications, Inc., and SpinCo to Assign and Transfer Control of FCC Licenses and Other Authorizations*, Public Notice, DA 14-986 (rel. Jul. 10, 2014) (“*Public Notice*”).

<sup>3</sup> *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Transfer Control of Licenses and Authorizations, Applications and Public Interest Statement* (filed Apr. 8, 2014).

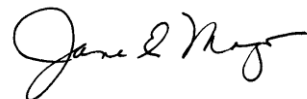
The proposed transactions, particularly when considered along with the proposed merger of AT&T and DirecTV<sup>4</sup>, have the potential to impact the broadcast industry in a number of important ways. Both deals highlight, in particular, the disparity in the nature of the FCC's ownership rules for broadcast television versus other competing video service providers.<sup>5</sup>

NAB is not commenting on the substance of the proposed merger, but we are monitoring the record and other relevant developments in the case. NAB understands that Comcast is engaged in conversations with a number of broadcasters to hear their concerns relating to the transaction's potential implications for broadcasters. NAB hopes that these conversations will prove fruitful.

Should NAB believe that it can contribute additional substantive data and information that could assist in the evaluation of this significant transaction, NAB reserves the right to file additional comments at that time.

Respectfully submitted,

**NATIONAL ASSOCIATION OF  
BROADCASTERS**  
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Jane E. Mago

August 25, 2014

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<sup>4</sup> See *Applications of AT&T Inc. and DIRECTV for Consent to Assign or Transfer Control of Licenses and Authorizations* (filed June 11, 2014).

<sup>5</sup> See, e.g., Comments of NAB in MB Docket No. 14-16 at 17-18 (Mar. 21, 2014).