

Dear Chairman Genachowski:

We write to express our deep concern with the merger of Comcast and NBC-Universal announced on January 18, 2011. A merger of this size and scope will have far-reaching effects on consumers, communities and our entire media system for years to come.

The Federal Communications Commission's mandate is to protect and foster the public interest, and we believe that the agency has failed to meet its mandate in the case of this merger. While we applaud a number of the conditions placed on the merger, none of the conditions attached tip the balance of the scale in favor of the public interest.

We concur with FCC Commissioner Michael Copps that, at the end of the day, "many of the new commitments that have been added aim no higher than maintaining the status quo. The status quo is not serving the public interest." Our media system already suffers as a result of years of runaway consolidation that diminished the diversity of voices on the air, gutted our nation's newsrooms, and harmed the public interest. In recent years, during the Federal Communication Commission's ongoing review of media ownership rules, millions of Americans have written the FCC opposing further media consolidation and packed dozens of public hearings to speak out about the decline of media in their communities.

They are not alone. As a candidate, President Obama said, "The Commission has failed to further the goals of diversity in the media and promote localism, and as a result, it is in no position to justify allowing for increased consolidation of the market," and promised to "expand the diversity of voices in media." The FCC's review of the proposed Comcast-NBC merger is the first test of that promise.

The Comcast-NBC merger is the new face of media consolidation. As organizations representing hundreds of thousands of diverse, local citizens around the country, we are pledging today to be vigorous watchdogs, monitoring this newly merged media giant, and consistent advocates for the public interest. We ask you to make the same pledge.

The Comcast-NBC merger comes in the middle of your agency's ongoing review of media ownership laws. As you conduct that review, we call on you to conduct a more open, transparent and thorough process that truly engages the public.

The FCC's responsibility is to the public – it is not a deal broker, it is a federal regulator. Nothing in the record of this proceeding supports a finding that the combination of Comcast and NBC would further the FCC's congressional mandate to promote diversity, localism and the public interest. It is not enough to adopt Comcast's own voluntary promises and make them enforceable as conditions placed on the merger.

The American people expect and demand better.

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