



Consumer Federation of America



Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

March 23, 2010

Re: Media Access Project Request for Extension of Time, In Re Applications of Comcast Corp., General Electric, and NBC Universal, Inc., to Assign and Transfer Control of Licenses, MB Dkt. 10-56

Dear Ms. Dortch,

Free Press, Consumer Federation of America, and Consumers Union submit this letter in support of Media Access Project's (MAP) request for a 45 day extension to file petitions to deny, oppositions, and comments in the above-captioned matter. Media Access Project, *Motion for Extension of Time*, filed in MB Dkt. No. 10-56 (Mar. 22, 2010). An extension is reasonable and appropriate given the wide-ranging consequences of the proposed merger between Comcast and NBC Universal on competition and the public interest.

As MAP observes in its motion, participation in several FCC proceedings with rapidly pending deadlines will necessarily drain already limited time and staff resources from organizations such as ours, and could adversely affect our ability to participate in merger proceeding. *MAP Motion for Extension of Time* at 1-2. However, these other deadlines aside, the Comcast-NBC merger itself is sufficiently complicated to merit an extension. The transaction at issue involves a significant number of media properties in distinct product and geographical markets, each warranting substantial factual, legal, and economic analysis. In addition to the proposed transfer of over two dozen broadcast television licenses in major markets, the merger also implicates programming and distribution markets, as well as the effectiveness of existing FCC regulatory regimes in light of the scope of a Comcast-NBC combination.

Moreover, the Commission's requirement that parties raise all applicable merger issues in their initial filings, and its prohibition on the introduction of new issues in responses or replies, necessitates additional time to ensure that parties are able to provide the FCC with as full a record as possible at the outset of the pleadings cycle. *FCC Public Notice*, "Commission Seeks Comment on Applications of Comcast Corp., General Electric, and NBC Universal, Inc., to Assign and Transfer Control of Licenses," MB. Dkt. 10-56 (Mar.

18, 2010) at 5. Given the complex and far-reaching nature of the proposed transaction, it is essential that parties participating in the proceeding have adequate time to research, analyze, and effectively present the impact of this merger on innovation, competition, and the public interest.

Accordingly, we strongly encourage the Commission to grant the extension and establish revised filing deadlines consistent with MAP's request.

Respectfully
submitted,

_____/s/_____
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