

DESTINATION NETWORK



The Official Visitor
Information Station of the
Atlanta Convention and
Visitors Bureau
Atlanta, GA
404.688.7138

June 5, 2014

LPTV Owners

Re: Comcast/Time Warner Merger

Dear Sir or Madam:



Beaches of South
Walton, Destin, Ft.
Walton, Pensacola, FL
850.837.9333

Myrtle Beach, SC
Pawley's Island, SC
843.449.6420

Panama City and
Panama City Beach, FL
850.234.2773

I am the President of Beach TV Properties, Inc., which owns several low power television ("LPTV") stations in the southeastern United States. I am writing to ask you to join the fight against the Comcast/Time Warner merger because it threatens the entire LPTV industry.

As you know, cable television companies have divided LPTV stations into two classes -those who get free carriage on the local cable system by retransmission consent and those who do not. Carried LPTV stations reach an audience far beyond their authorized signal contour and get advertising revenue and other exposure not available to the LPTV stations that are not carried on the cable system. As you also know, the so-called "leased access" rules provide no meaningful opportunity for LPTV carriage on a cable system due to the exorbitant fees.



Key West, Marathon
and the Lower Keys, FL
305.294.9661

This two-tiered structure of the LPTV industry is going to get worse with the Comcast/Time Warner merger. The merger will solidify a trend set in motion by Comcast to favor -by a significant margin -- the carriage of Spanish language LPTV programming on local cable systems. While this may be good news in the short term for those LPTV channels, it is extremely dangerous to the entire LPTV industry over the long term because Comcast - not the audience or the FCC -will shape the LPTV marketplace.



NEW ORLEANS TELEVISION
Official Visitor Information TV
Station of the New Orleans
Metropolitan Convention
& Visitors Bureau
New Orleans, LA
504.524.9900

We recently commissioned a study of the carriage of over five hundred LPTV channels in forty-seven different markets served by Comcast and Time Warner. We learned that Time Warner carries ten percent (10%) of available local LPTV channels on its cable systems, with four percent (4%) being Spanish language and six percent (6%) non-Spanish language programming.



Hilton Head, SC
843.449.6420

Comcast carries over twenty-two percent (22%) of available local LPTV channels on its cable systems. Spanish language LPTV channels

Panama City Beach, FL
850.235.4176

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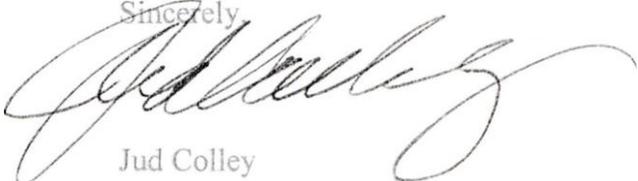
outnumber non-Spanish language LPTV channels by 3 to 1 on Comcast systems. Currently forty-two percent (42%) of the Spanish language LPTV channels in its markets but only 9% of non-Spanish language LPTV channels. Moreover, 3 out of 4 LPTV channels affiliated with Telemundo (owned by Comcast) are carried on Comcast systems.

We do not object to Telemundo and other Spanish language LPTV channels each reaching an audience beyond their signal contour, provided all LPTV channels have the same opportunity to reach the same audience without regard to content. A bedrock principle of this country and the broadcasting industry is that all speakers get the same opportunity to deliver their message to the audience regardless of content. Comcast has been undermining that principle by giving Telemundo and other Spanish language LPTV channels preferred access to their cable systems over non-Spanish language LPTV channels. We believe that discrimination will spread to Time Warner cable systems after the merger.

For these reasons, we are going to ask the FCC to not approve the Comcast/Time Warner merger. We are going to propose that if the merger is approved, then it be conditioned upon Comcast committing to provide all LPTV channels leased access carriage on its cable systems at a rate not to exceed the rate being charged (if any) for the carriage of any LPTV channel by retransmission consent. We propose the FCC level the playing field for all LPTV channels, Spanish language and non-Spanish language alike, for carriage on Comcast cable systems.

We will ask the FCC to set Comcast's leased access rates for LPTV carriage based on Comcast's own behavior. If Comcast is prepared to carry twenty-two percent (22%) of local LPTV channels by retransmission consent at no charge, then the maximum rate for leased access carriage of other LPTV channels should be the same.

I am asking you to join in this effort. If you are interested, please contact me.

Sincerely,

Jud Colley