

The Caucus for Producers, Writers & Directors

Comments to the Federal Communications Commission on the Proposed Merger of Comcast and NBC

Executive Summary

The Caucus for Producers, Writers & Directors urges a 25% carve out of the domestic prime time schedule of cable and free broadcast networks as a condition of approval of the Comcast – NBC merger. This condition is needed to protect and promote the small businesses that produce quality, independent television programming.

The Caucus is a group of independent producers, writers and directors committed to increasing the quality of programming available to viewers.

In addition to threatening the diversity of views expressed in a marketplace of ideas dominated by a handful of companies that control the production and distribution of content, consolidation threatens the livelihoods of the small business owners and entrepreneurs who make up the vast majority of the independent production community.

The few companies that control most of the production and distribution of content have an incentive to prevent competition and produce content that is easily distributed across a variety of platforms and that is easily repurposed – even at the expense of quality and diversity. The losers in this effort are viewers and independent producers. The fewer producers and distributors of content there are the harder it is for small businesses and entrepreneurs to bring new ideas to the marketplace.

The Comcast/NBC Universal merger should not come at the expense of small business and the general public. Creating a carve out as a condition of the merger can help undo some of the damage already done by media consolidation, can help ensure a vibrant marketplace of ideas and can help promote small businesses.