

Tuesday, January 19, 2016

Chairman Tom Wheeler
Federal Communications Commission
445 12th St, SW
Washington, DC 20554

Re: *Downloadable Security Technical Advisory Committee Report*, MB Docket No. 15-64

Dear Chairman Wheeler:

We, the undersigned public interest groups, are writing to support the Commission moving forward with a proceeding to complete the recent DSTAC effort and ensure a competitive solution for set-top box marketplace. Opening up video device competition would benefit consumers in a number of ways.

An open set-top box market is a key component of freeing consumers from unnecessary monthly rental fees, and it would enable them to more easily access online video content right alongside their subscription TV programming. It would benefit free expression and diverse content by creating a new way for creators to reach consumers, while spurring innovation by bringing the same openness to the video device market that has benefitted smartphones, PCs, and other areas of consumer electronics.

Right now, to watch online video on most televisions, viewers have to be technically-savvy enough to attach a laptop to their TV, or have to buy a separate box that can access online video. If people could easily access online and cable programming on the same device, more programmers might be able to reach viewers without having to go through the cable gatekeeper. The “competitive navigation solution” proposal currently before the FCC solution is the best way to accomplish this.

There is more compelling content now than there is room on the cable bundle--especially considering how large, mainstream programmers can crowd out diverse voices. But where the cable bundle has a limited amount of space, the Internet is open to any creator. This means more than just cool new shows to watch. It means that communities that have been unserved or underserved by the cable bundle can access programming tailored to their interests and needs, and it means that creators don't have to worry about appealing to the cable bottom line. It means that technology entrepreneurs wouldn't have to ask permission from local cable monopolies to build a new app or service. This would be a significant boost to democratic discourse and an open media marketplace.

That said, an open set-top box market would benefit programmers currently carried by cable, as well. Allowing viewers more ways to access content would make subscription TV a more compelling product, and it would give viewers the ability to watch TV on more devices around the house.

Opening up the set-top box marketplace also means helping to quell the outrageous price-gouging consumers currently face at the hands of the cable companies. Most consumers currently rent their set-top box from the cable companies at a rate that averages \$231/per household per year - which adds up to more than \$20 billion of extra revenue for the cable monopolies. The competitive navigation solution would eliminate the need for consumers to rent a device for each TV they want to watch programming on.

This strong-arming of consumers will only get worse if the Commission does not move forward soon to come up with a modern solution that allows for consumers to use competitive devices. Without Commission action, we will continue to see high fees, clunky and outdated set-top boxes, and cable continuing to extend its dominance over the video marketplace. But the record already amply demonstrates why the Commission should act, and it's no secret that consumers are frustrated with the status quo.

What Americans need now is for the FCC to help create ways to bypass the cable gatekeeper--not for it to allow cable to continue strengthening its grip. We urge the Commission to move forward quickly with a proceeding that ensure an open, competitive content market for creators, innovators, and consumers in the digital age.

Sincerely,

Common Cause

Demand Progress

Free Press

Fight for the Future

National Hispanic Media Coalition

New America's Open Technology Institute

Public Knowledge

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