

VIA ECFS

April 29, 2010

William T. Lake
Chief, Media Bureau
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*, MB Docket No. 10-56, Request for Enhanced Confidential Treatment

Dear Mr. Lake:

Comcast Corporation (“Comcast”), pursuant to section 1.41 of the Commission’s rules¹ and the *Second Protective Order* in the above-referenced proceeding,² submits this supplemental letter to provide further detail regarding the category entitled “Comcast Advertising Sales, Financial, and Operating Results” described in the confidentiality request filed by Comcast, General Electric Company, and NBC Universal, Inc. on April 27, 2010.³ Based on the further description below, Comcast renews its request for enhanced confidential treatment for this sensitive information.⁴

Comcast Advertising Sales, Financial, and Operating Results: This category includes detailed information about advertising, including operating and capital expenses related to the development of advanced advertising platforms. The information in these documents is disaggregated in a number of ways. For example, it is reported on an annual basis for 2006 through 2009 and includes detailed

¹ 47 C.F.R. § 1.41.

² *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*, Second Protective Order, MB Docket No. 10-56, DA 10-371 ¶ 3 (MB rel. Mar. 4, 2010) (“*Second Protective Order*”).

³ See Letter from Michael H. Hammer, A. Richard Metzger, Jr., and David H. Solomon, Counsel for Comcast Corporation, General Electric Company, and NBC Universal, Inc., MB Docket No. 10-56 (Apr. 27, 2010).

⁴ See *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees*, Order, MB Docket No. 10-56, DA 10-662 (MB rel. Apr. 16, 2010).

budget information for 2010. In addition, the information is disaggregated by Comcast business unit (e.g., Comcast Cable and Comcast Spotlight) and further broken down by specific categories of expenditure (e.g., capital expenditures, operating expenses, and vendor payments).

Because this information relates to an emerging technology, its competitive significance is especially great. Comcast treats this information as highly confidential and does not release it in this disaggregated fashion. A competitor gaining access to this information would be able to discern Comcast's strategic goals with respect to the rollout of various advanced advertising platforms and technologies, thereby gaining an unfair competitive advantage in the marketplace.

Comcast respectfully requests that the Commission confirm that this specific category of information and documents be treated as "Highly Confidential Information" under the *Second Protective Order* and made available solely to Outside Counsel of Record, their employees, and *bona fide* Outside Consultants and experts. If you have any questions regarding the foregoing, do not hesitate to contact the undersigned.

Respectfully submitted,

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