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Barbara S. Esbin
Admitted in the District of Columbia

June 7, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

via ECFS

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 Licenses; MB Docket No. 10-56

Dear Ms. Dortch:

On June 4, 2010, Ross Lieberman of the American Cable Association (“ACA”), Tom Cohen of Kelley Drye & Warren, and the undersigned had a telephone conference with William Freedman, James Bird and Marcia Glauberman regarding the Comcast Information Request¹ and the NBC Universal Information Request.²

The ACA representatives raised questions about the scope, format, and timing of the information and documents to be submitted in connection with the Comcast and NBC Universal Information Requests. The ACA, which has already made a detailed presentation to the Commission staff on the horizontal and vertical competitive harms that will flow from the proposed combination,³ wants to ensure that Comcast and NBC Universal submit all necessary data and information in the record in a timely fashion so that the Commission and other parties to the proceeding may conduct the empirical analysis required to confirm and determine the magnitude of these and other harms, and thereafter provide meaningful comments for the Commission to consider. In sum, it is essential that the submission be complete, timely, and in a format that is easy to access.

Further, all interested parties need to have sufficient time to review and evaluate the submission. To that end, the ACA expressed concern to the FCC staff about the ability of these

¹ *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses*, Information and Discovery Request for Comcast Corporation, MB Docket No. 10-56 (rel. May 21, 2010) (“Comcast Information Request”).

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 Licenses*, Information and Document Request for NBC Universal, Inc. , MB Docket No. 10-56 (rel. May 21, 2010) (“NBC Universal Information Request”).

³ *Ex Parte* Presentation of the American Cable Association, MB Docket No. 10-56, Apr. 15, 2010.

parties to comply with that portion of the Commission's March 18th Public Notice⁴ establishing the comment cycle in the above referenced proceeding that requires parties who wish "to raise new issues based on new facts or newly discovered facts" to make such filings within 15 days after such facts are discovered, given the large amount of data requested and the proximity of the filing date for responses to the Information Requests – June 11th – to the filing deadline for Comments/Petitions to Deny on June 21, 2010.

The ACA is not seeking to delay the comment cycle or the Commission's review, but, based on experience, it expects the data submission to be very useful in its analysis of the harms resulting from the proposed combination. The ACA therefore urges the Commission to ensure that all parties have sufficient time to review the complete submission and provide comments.

Sincerely,



Barbara S. Esbin

cc (via email): William Freedman
James Bird
Marcia Glauberman

⁴ *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses*, Information and Discovery Request for Comcast Corporation, Public Notice, MB Docket No. 10-56 (rel. March 18, 2010) ("March 18th Public Notice").