

VIA ECFS

June 10, 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 Licenses*, 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, and support for confidential treatment of, the categories of information entitled “Comcast’s Detailed Financial Data,” “Comcast’s Detailed Customer Data,” and “Comcast’s Advertising Sales, Financial, and Operating Results,” as described in the confidentiality request filed by Comcast, General Electric Company, and NBC Universal, Inc. on June 8, 2010 (“*June 8 Letter*”).³ The *June 8 Letter*, as hereby supplemented, seeks protection of Highly Confidential information that is responsive to the Commission’s May 21, 2010 Information and Discovery Request.⁴

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 Licenses*, 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 (June 8, 2010) (“*June 8 Letter*”).

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, MB Docket No. 10-56 (rel. May 21, 2010) (the “*Request*”).

Comcast's Detailed Financial Data: Several Requests require the production of detailed financial data disaggregated by Designated Market Areas ("DMAs"). As noted in the *June 8 Letter*, the Commission has previously recognized the need for enhanced confidential treatment of financial data disaggregated at this level. Comcast generally keeps such data on a sub-regional level and has agreed to produce data on a sub-region basis in response to the Requests. These sub-regions are in many instances co-terminus with or comparable to DMAs. The need for enhanced protection for financial data disaggregated by sub-region, therefore, is the same as if the data were being provided by DMA. In addition, some of the revenue and financial data responsive to the Requests are disaggregated by programming distributor, network, or other business unit or entity. Release of the data in such form would be highly valuable to competitors and cause severe harm to Comcast. Accordingly, Comcast respectfully renews its request for enhanced confidential treatment for the detailed financial data to be produced in response to Requests 4.c-d, h, j (insofar as Request 4.j relates to detailed financial data), k, and o; 5.f-i; and 6.h-j.

Comcast's Detailed Customer Data: Several Requests require the production of detailed customer data disaggregated by DMA, which the Commission has likewise previously recognized justifies enhanced confidential treatment. Comcast generally keeps this data on a sub-regional level and has agreed to produce it on a sub-region basis in response to the Requests. Because these sub-regions are in many instances co-terminus with or comparable to DMAs, the need for enhanced protection of such information provided at the sub-region level is the same. Comcast also maintains certain customer programming choice and related data on a national level, including number of views or downloads and distribution methods, that are confidential and would be of significant commercial value to its competitors. Release of this data would cause competitive harm to Comcast. Comcast thus respectfully renews its request for enhanced confidential treatment for the detailed customer data Requests 4.a-g, i, and l-n; 5.a-b and d-e; 6.f; and 17 (insofar as Request 17 relates to detailed customer data).

Certain Requests also require the production of detailed customer data on a monthly basis. Comcast keeps some of this data on an annual basis and has agreed to provide such responsive information on that basis. Combined with other information sought by these Requests, these annualized data are being provided at a level of granularity that would be highly valuable to market competitors. Release of this data would cause severe competitive harm to Comcast. Therefore, Comcast respectfully renews its request for enhanced confidential treatment for the detailed financial data to be produced in response to Requests 4.a-g, i, and l-n; 5.a-b and d-e; 6.f; and 17 (insofar as Request 17 relates to detailed customer data).

Comcast's Advertising Sales, Financial, and Operating Results: Several Requests require the production of advertising sales, financial, and operating results disaggregated by business unit. In response to these Requests, Comcast will be providing information by network, distributor, cable systems, and other business units and entities. Release of data produced on these levels would be highly valuable to market competitors and would place Comcast at a severe competitive disadvantage. Comcast respectfully renews its request for enhanced confidential treatment for the advertising sales, financial, and operating results to be produced in response to Requests 6.j (insofar as the subpart seeks

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information concerning advertising revenue); 10 (insofar as the Request seeks advertising revenues); 26.c; and 48.

Comcast respectfully requests that the Commission confirm that these and the other specific categories of information and documents identified in the *June 8 Letter* 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, please do not hesitate to contact me.

Respectfully submitted,

Michael H. Hammer

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