

June 21, 2010

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William T. Lake
Chief, Media Bureau
Federal Communications Commission
445 12th 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:

Bloomberg, L.P. (“Bloomberg”), pursuant to Section 1.41 of the Commission’s rules¹ and the Second Protective Order in the above-referenced proceeding (“Merger”), submits this letter to request enhanced confidential treatment for certain information and documents to be submitted to the Commission as part of Bloomberg’s filing opposing the Merger.² As set forth below, Bloomberg’s information falls within existing categories of enhanced confidential treatment that the Commission has already recognized in this proceeding.

All of the information and documents for which highly confidential treatment is sought include some of Bloomberg’s most sensitive business information. It is information that Bloomberg usually does not disclose and is the type of information that the Commission has previously afforded heightened confidential protection. Disclosure of this material to Bloomberg’s competitors in this proceeding would have a serious negative effect on Bloomberg’s business and place Bloomberg at a significant competitive disadvantage. Therefore, Bloomberg requests that the Commission confirm that the categories of information and documents identified below may be designated as “Highly Confidential

¹ 47 C.F.R. § 1.41.

² Applications of Comcast Corp., General Electric Co. and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licensees, Second Protective Order, 25 FCC Rcd 2140 (2010).

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Information” under the Second Protective Order and thereby made available solely to Outside Counsel of Record, their employees, and bona fide Outside Consultants and experts.

Pursuant to the procedures set forth in the Second Protective Order, this letter describes the information and documents for which Bloomberg seeks heightened protection and explains the need and justification for such protection. This letter identifies, to the extent applicable, the relevant category of Highly Confidential Information already established in the Second Protection Order.

Bloomberg seeks enhanced protection for the following information that fall into categories of information and documents that the Commission has already established for Comcast and/or NBCU as receiving enhanced protection under the Second Protective Order:

A. Bloomberg’s Detailed Financial Data

In the Second Protective Order, the Commission granted enhanced protection for Comcast’s and NBC’s detailed financial data, including:

Comcast’s Detailed Financial Data. Cost and revenue data, disaggregated by designated market area (“DMA”), city, sub-city unit, or at the individual subscriber level, and separately stated for video, voice and Internet services that is further broken down by month, year or several years, including budget information for 2010; ...³

In the economic report to be filed with Bloomberg’s opposition, Bloomberg discloses detailed financial information of the nature defined above. Therefore, Bloomberg requests that the Commission determine that the financial information included in Bloomberg’s economic report may be treated as “Highly Confidential Information”.

B. Bloomberg’s Advertising Revenue Data

In the Second Protective Order, the Commission granted enhanced protection for Comcast’s detailed financial data, including:

NBCU’s Advertising Revenue Data. Information relating to advertising revenue that (i) discloses an individual NBC owned and operated station’s net advertising revenue, (ii) discloses the net advertising revenue for the NBC Network only, disaggregated by source (i.e., solely the advertising revenue, excluding syndicated

³ *Id.*, ¶16.

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programming or other licensing fees) and by year, and (iii) discloses the relative values of advertising revenues generated by a viewer of NBC programming from an online source compared to an NBC owned and operated television station.⁴

In the economic report to be filed with Bloomberg's opposition, Bloomberg discloses detailed advertising revenue information of the nature defined above. Therefore, Bloomberg requests that the Commission determine that the revenue information included in Bloomberg's economic report may be treated as "Highly Confidential Information".

C. Bloomberg's Advertising Sales, Financial and Operating Results

In the Second Protective Order, the Commission granted enhanced protection for Comcast's advertising sales, financial and operating results, including:

Comcast Advertising Sales, Financial and Operating Results: Detailed information regarding advertising revenues and expenses, including expenses relating to the development of advanced advertising platforms, disaggregated by business unit and type of expense.⁵

In the economic report to be filed with Bloomberg's opposition, Bloomberg discloses detailed advertising revenue information of the nature defined above. Therefore, Bloomberg requests that the Commission determine that the advertising revenue information included in Bloomberg's economic report may be treated as "Highly Confidential Information."

In the economic report to be filed with Bloomberg's opposition, Bloomberg discloses detailed advertising sales, financial and operating results of the nature defined above. Therefore, Bloomberg requests that the Commission determine that the advertising sales, financial and operating results information included in Bloomberg's economic report may be treated as "Highly Confidential Information".

D. Bloomberg's Carriage Agreement Terms and Conditions:

By the terms of the April 30 Supplement, the Commission granted enhanced protection for Comcast's video programming and carriage agreement terms and conditions, including:

⁴ Id.

⁵ Id.

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[i]nformation relating to the details of video programming and carriage agreements, programming rights, retransmission agreements, linear carriage agreements, video-on-demand agreements, and online distribution agreements, including information regarding the details of the negotiation for such agreements; analyses of such agreements or negotiations.⁶

In the economic report to be filed with Bloomberg's opposition, Bloomberg discloses details of terms and conditions of their carriage agreements, affiliation agreements, and distribution agreements. Therefore, Bloomberg requests that the Commission determine that the information pertaining to Bloomberg carriage agreements included in Bloomberg's economic report may be treated as "Highly Confidential Information".

E. Bloomberg's Current and Forward-Looking Business Strategies and Plans:

By the terms of the April 30 Supplement, the Commission granted enhanced protection for Comcast's current and forward-looking business strategies and plans, including:

[i]nformation relating to current and forward-looking business strategies and marketing plans, including detailed business models, projections and plans relating to the proposed Comcast-NBCU joint venture.⁷

In the economic report to be filed with Bloomberg's opposition, Bloomberg discloses details of their current and forward-looking business strategies and plans, including projections and plans relating to the proposed Comcast-NBCU joint venture. Therefore, Bloomberg requests that the Commission determine that the information pertaining to Bloomberg carriage agreements included in Bloomberg's economic report may be treated as "Highly Confidential Information".

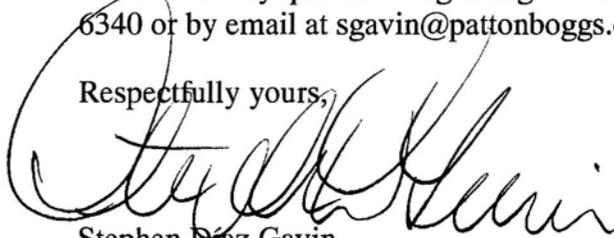
⁶ Letter from William T. Lake, Chief, Media Bureau, to Michael H. Hammer, Wilkie Farr & Gallagher LLP, A. Richard Metzger, Jr., Lawler, Metzger, Kenney & Logan, LLC, David H. Solomon, Wilkinson Barker Knauer, LLP, Dated Apr. 30, 2010, in MB Docket No. 10-56.

⁷ Id.

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If there are any questions regarding this matter, please contact the undersigned at (202) 457-6340 or by email at sgavin@pattonboggs.com.

Respectfully yours,



Stephen Diaz Gavin

cc: John Flynn
Judith Herman
Jessica Almond
Daniel Shiman
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Paul de Sa
Donald Stockdale
Erin McGrath
William Freedman
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