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June 21, 2010

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: 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**

Dear Ms. Dortch:

Attached for filing *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, are the Comments of the City of Seattle, Washington; the City of Tacoma, Washington; the City of Renton Washington; the City of Maple Valley, Washington; the City of Des Moines, Washington; the City of University Place, Washington; the City of Longview, Washington; the City of Issaquah, Washington; the City of Spokane, Washington; the City of Kirkland, Washington; the City of Milton, Washington; the City of Minneapolis, Minnesota; the City of Bloomington, Minnesota; the City of Coon Rapids, Minnesota; the City of Springfield, Oregon; the Metropolitan Area Communications Commission; the Rainier Communications Commission; the Ramsey/Washington Counties Suburban Cable Communications Commission II; the North Metro Telecommunications Commission; the North Suburban Communications Commission; and the South Washington County Telecommunications Commission.

Please feel free to contact me with any questions you may have.

Very truly yours,
BRADLEY & GUZZETTA, LLC

Stephen J. Guzzetta

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Attachments

†Also admitted in Wisconsin
*Also admitted in Massachusetts and the
District of Columbia

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
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Applications of Comcast Corporation,)
General Electric Company,) MB Docket No. 10-56
and NBC Universal, Inc.)
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For Consent to Assign Licenses or)
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COMMENTS OF THE CITY OF SEATTLE, WASHINGTON; THE CITY OF TACOMA, WASHINGTON; THE CITY OF RENTON, WASHINGTON; THE CITY OF MAPLE VALLEY, WASHINGTON; THE CITY OF DES MOINES, WASHINGTON; THE CITY OF UNIVERSITY PLACE, WASHINGTON; THE CITY OF LONGVIEW, WASHINGTON; THE CITY OF ISSAQUAH, WASHINGTON; THE CITY OF SPOKANE, WASHINGTON; THE CITY OF KIRKLAND, WASHINGTON; THE CITY OF MILTON, WASHINGTON; THE CITY OF MINNEAPOLIS, MINNESOTA; THE CITY OF BLOOMINGTON, MINNESOTA; THE CITY OF COON RAPIDS, MINNESOTA; THE CITY OF SPRINGFIELD, OREGON; THE METROPOLITAN AREA COMMUNICATIONS COMMISSION; THE RAINIER COMMUNICATIONS COMMISSION; THE NORTH METRO TELECOMMUNICATIONS COMMISSION; THE NORTH SUBURBAN COMMUNICATIONS COMMISSION; THE RAMSEY/WASHINGTON COUNTIES SUBURBAN CABLE COMMUNICATIONS COMMISSION II; AND THE SOUTH WASHINGTON COUNTY TELECOMMUNICATIONS COMMISSION

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SUMMARY

The Commission must address the important consumer protection issues identified in these Comments. Without adequate protections, the proposed acquisition of NBC Universal, Inc. (“NBCU”) by Comcast Corporation (the “Transaction”) must be denied. If the Federal Communications Commission (“FCC”) ultimately decides to approve the Transaction, the following conditions should be attached: (i) Comcast Corporation, through its affiliates and subsidiaries (“Comcast”), should eliminate the high-definition (“HD”) technology fee it is charging; (ii) existing digital video recorder (“DVR”) service fees should be eliminated; (iii) basic-only subscribers should be charged the lowest rate available for set-top devices in accordance with the FCC’s unbundling and equipment aggregation rules and decisions; (iv) Comcast should file preliminary and/or final FCC Forms 1235 for stated network upgrades associated with the provision of HD cable service and provide refunds to eligible subscribers, as appropriate; and (v) properly unbundle HD receiver and HD digital video recorder (“DVR”) costs and rates.

Based on the compelling evidence furnished in these Comments, it is evident that Comcast’s HD Technology Fee effectively evades rate regulation and/or violates the Cable Communications Policy Act of 1984, as amended by the Cable Television Consumer Protection and Competition Act of 1992 and the Telecommunications Act of 1996. Comcast has admitted to using this fee as an unregulated subsidy of network improvements. In communities lacking effective competition, these are improvements for which Comcast should have filed FCC Form 1235. Lesser plant upgrades should have been reflected in Form 1240 filings. Comcast failed to report and justify the basis for the amount of the HD Technology Fee by either of these approved mechanisms in some local franchising areas, instead levying an arbitrary charge for HD support.

In other cities, the HD Technology Fee is in addition to charges Comcast has indicated are for the purpose of network improvements for HD support. In these communities, Comcast is blatantly recovering the same costs twice from the same subscribers.

The FCC requires unbundled equipment and service fees so that cable operators' charges are more transparent to regulators and consumers. Comcast's HD Technology Fee comingles equipment and service fees, in contravention of the FCC's and Congress's unbundling requirements, because it purportedly both funds HD network capabilities and replaces the HD converter box rental fee for some consumers. The fee also serves as a disincentive for consumers to purchase competitive navigation devices, because consumers are already paying for Comcast's box with the HD Technology Fee. A user who chooses to purchase or lease a third-party device will pay for the same functionality twice – something most consumers will not do. The effect of this disincentive is to harm competing navigation device manufacturers and retailers and to limit consumer choice.

In addition to double-charging some subscribers for HD network upgrades, and hiding the cost of HD equipment rental in a blanket HD Technology Fee, Comcast is charging basic-only HD subscribers more than the basic-only converter rate – an apparent violation of FCC equipment averaging rules. Furthermore, Comcast is aggregating costs of HD receivers and HD DVR equipment, further limiting any subscriber or regulator's ability to see how or why Comcast is charging the fees that it does. Finally, Comcast did not provide adequate notice to communities in Washington State when it implemented certain rate increases. This failure of the most basic form of regulatory compliance, coupled with evasive bundling and pricing schemes for high definition equipment and service, indicate Comcast's unfitness to take on the additional responsibility of NBCU's licenses in this proposed joint venture.

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I. INTRODUCTION.

The Federal Communications Commission (the “FCC”) must address the important consumer protection issues identified below as part of its public interest analysis in this proceeding. Without adequate protections, the proposed acquisition of NBC Universal, Inc. (“NBCU”) by Comcast Corporation must be denied. In the event the FCC decides to approve the various applications submitted by Comcast Corporation, the General Electric Company and

NBCU, the commitments set forth herein should be attached as enforceable conditions to the approval.

These Comments are filed on behalf of the City of Seattle, Washington, the City of Tacoma, Washington, the City of Renton, Washington, the City of Maple Valley, Washington, the City of Des Moines, Washington, the City of University Place, Washington, the City of Longview, Washington, the City of Issaquah, Washington, the City of Spokane, Washington, the City of Kirkland, Washington, the City of Milton, Washington, the City of Minneapolis, Minnesota, the City of Bloomington, Minnesota, the City of Coon Rapids, Minnesota, the City of Springfield, Oregon and the following municipal joint powers commissions in the above-captioned proceeding: the Metropolitan Area Communications Commission (an intergovernmental cooperative entity, which includes the cities of Banks, Beaverton, Cornelius, Durham, Forest Grove, Gaston, Hillsboro, King City, Lake Oswego, North Plains, Rivergrove, Tigard, and Tualatin, Oregon, and unincorporated areas of Washington County, Oregon); the Rainier Communications Commission (an intergovernmental agency formed pursuant to Washington law, which includes the cities of Bonney Lake, Carbonado, DuPont, Fife, Milton, Orting, Pierce County, Puyallup, Ruston, Steilacoom, Sumner, Tacoma, University Place, and Wilkeson, Washington); the North Metro Telecommunications Commission (a municipal joint powers commission consisting of the cities of Blaine, Centerville, Circle Pines, Ham Lake, Lexington, Lino Lakes, and Spring Lake Park, Minnesota); the North Suburban Communications Commission (a municipal joint powers commission consisting of the cities of Arden Hills, Falcon Heights, Lauderdale, Little Canada, Mounds View, New Brighton, North Oaks, Roseville, St. Anthony, and Shoreview, Minnesota); the Ramsey/Washington Counties Suburban Cable Communications Commission II (a municipal joint powers commission consisting of the

cities of Birchwood, Dellwood, Grant, Lake Elmo, Mahtomedi, Maplewood, North St. Paul, Oakdale, Vadnais Heights, White Bear Lake, White Bear Township, and Willernie, Minnesota); and the South Washington County Telecommunications Commission (a municipal joint powers commission consisting of the municipalities of Woodbury, Cottage Grove, Newport, Grey Cloud Island Township, and St. Paul Park, Minnesota) (collectively, the “LFAs”). The LFAs represent over sixty-five cities and townships in Minnesota, Washington, and Oregon with a combined population of over 1,200,000 residents and over 600,000 cable subscribers. Comcast Corporation, through its various subsidiaries and affiliates, provides cable service in the franchise areas represented by the LFAs.¹

The LFAs are generally responsible for administering and enforcing their local cable franchises. This authority entails, among other things, resolving consumer complaints regarding cable service and otherwise protecting and promoting the public interest, and requiring Comcast’s compliance with applicable laws and regulations to the extent described in the LFAs’ individual franchise documents. In addition, many of the LFAs are empowered to regulate basic service, equipment and installation rates in accordance with Federal Communications Commission (“FCC”) regulations and local rules, and are certified rate regulation authorities that regularly monitor and review Comcast’s ratemaking practices and calculations. Accordingly, the LFAs have a fundamental interest in ensuring the proposed joint venture between Comcast Corporation and the General Electric Company involving NBCU (the “Transaction”)² does not negatively impact Comcast’s quality of service, the diversity and availability of programming

¹ Comcast Corporation and its affiliates and subsidiaries are collectively referred to in these Comments as “Comcast.”

² See *In the Matter of Applications for Consent to the Transfer of Control of Licenses, General Electric Company, Transferor, to Comcast Corporation, Transferee, Applications and Public Interest Statement*, MB Docket No. 10-56 (January 28, 2010).

content available on Comcast's systems in the LFAs' franchise areas and the accessibility of that content via competitively available navigation devices. In addition, the LFAs believe it is important for the FCC to prevent the Transaction from resulting in increased programming costs, and ultimately subscriber rate increases, as part of its public interest review. In this regard, the FCC should consider Comcast's prior actions and its willingness to comply with applicable laws and regulations as a predictor of whether Comcast is likely to adhere to programming access requirements and any conditions that may be imposed on the Transaction. This is particularly true when, as here, a cable operator will obtain significant control over programming content and will become a vertically integrated programming producer and distributor that can abuse, and may have a financial and competitive incentive to abuse, its ownership and control of popular and important intellectual property by limiting access to programming and engaging in discriminatory or excessive pricing.

As these Comments show, Comcast has consistently acted in a manner that circumvents and/or violates federal laws and regulations. In light of this conduct, the FCC should carefully consider whether the Transaction should be approved and, if so, what conditions should be placed on Comcast to proscribe ongoing and potential future transgressions. The LFAs believe the serious issues they have identified herein should be taken into consideration by the FCC as it evaluates the Transaction, and should be adequately addressed and remedied as part of any approval. Specifically, if the FCC elects to approve the Transaction, the LFAs respectfully request that the following conditions should be attached: (i) Comcast should eliminate the high-definition ("HD") technology fee it is charging; (ii) existing DVR service fees should be eliminated; (iii) basic-only subscribers should be charged the lowest rate available for set-top devices in accordance with the FCC's unbundling and equipment aggregation rules and

decisions; (iv) Comcast should file preliminary and/or final FCC Forms 1235 for stated network upgrades associated with the provision of HD cable service and provide refunds to eligible subscribers, as appropriate; and (v) properly unbundle HD receiver and HD digital video recorder (“DVR”) costs and rates.

II. COMCAST’S IMPOSITION OF AN HD TECHNOLOGY FEE IS AN IMPERMISSIBLE ATTEMPT TO EVADE FEDERAL RATE REGULATION REQUIREMENTS.

A. The FCC Has Clearly and Consistently Defined and Prevented Evasions of Federal Rate Regulation Rules and the Cable Communications Policy Act of 1984, As Amended.

Section 623(h) of the Cable Communications Policy Act of 1984, as amended by the Cable Television Consumer Protection and Competition Act of 1992 and the Telecommunications Act of 1996 (the “Cable Act”), 47 U.S.C. § 543(h), compels the FCC to adopt regulations which “establish standards, guidelines, and procedures to prevent evasions . . . of the requirements of this section . . .”³ The FCC has discharged its responsibilities under Section 623(h) by generally defining the concept of “evasion,” regularly acting on evasion complaints and adopting and modifying a comprehensive rate regulation scheme that requires cable operators not subject to effective competition to charge basic cable service rates that are reasonable and equipment and installation charges that are based on actual cost, plus a reasonable rate of return.⁴

The settled definition of an impermissible Section 623 evasion is “any practice or act which avoids the rate regulation provisions of the [Cable] Act or [FCC] rules contrary to the

³ 47 U.S.C. § 543(h) (2006).

⁴ See, e.g., Sections 623(b)(1) and 623(b)(3) of the Cable Act, 47 U.S.C. §§ 543(b)(1) and 543(b)(3) (2006).

intent of the [Cable Act] or its underlying policies.”⁵ Stated differently, “an evasion is an act attempting to elude scrutiny.”⁶ Whether a particular act constitutes a prohibited evasion does not depend on a cable operator’s intent but, rather, on the nature of the operator’s conduct itself.⁷ In applying this standard, the FCC will consider, among other things, whether or not specific behavior “was [actually and] primarily for a legitimate business purpose and not simply to evade rate regulation.”⁸ The FCC will also consider whether an action constitutes a “fundamental change” that removes a service or piece of equipment from rate regulation.⁹ To ensure that its definition of evasion evolves as services, technology and cable industry business practices evolve, the FCC reviews and revises its rules and decisions on an on-going basis, as necessary to meet its obligations under Section 623(h).¹⁰

In practice, the FCC has regularly invalidated the major restructuring of services and equipment charges where the end result would exempt a significant number of channels or pieces of equipment from rate regulation.¹¹ In addition, the FCC has indicated that it will invalidate the use of an alleged “unregulated” fee that would permit a cable operator to charge a higher

⁵ *Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation*, MM Docket No. 92-266, Report and Order and Further Notice of Proposed Rulemaking, 8 FCC Rcd 5631, 5915-16 (1993) (the “Rate Order”).

⁶ *Id.* at 5915.

⁷ *Adelphia Communications Corp. v. FCC*, 88 F.3d 1250, 1256 (D.C. Cir. 1996).

⁸ Rate Order at 5915-16. *See also Adelphia Cable Partners, L.P. (South Dade County, Florida) Letter of Inquiry Application for Review*, Memorandum Opinion and Order, 11 FCC Rcd 2461, 2464 (1995).

⁹ *Adelphia Cable Partners*, 11 FCC Rcd at 2464.

¹⁰ *Id.*

¹¹ *Id.* *See also C-TEC Cable Systems (McBain and Zeelander Township, Michigan) Letter of Inquiry*, Memorandum Opinion and Order, 10 FCC Rcd 1644, 1646-47 (1994); *Lincoln Cablevision (Lincoln, Nebraska) Letter of Inquiry*, Memorandum Opinion and Order, 10 FCC Rcd 1613, 1615-16 (1994).

effective rate than would be otherwise permitted under applicable rate regulation rules.¹²

Accordingly, the FCC should carefully and thoroughly evaluate Comcast's significant pricing and service changes and related marketing practices in the context of determining whether Comcast is qualified to own and control NBCU, and whether the Transaction is truly in the public interest.

B. Comcast Should Have Filed Appropriate FCC Forms 1235 with the LFAs to Recover Any Legitimate Network Upgrade Costs Associated with the Provision of HD Cable Service.

In late 2009 and March 2010 written notices sent to the LFAs, Comcast indicated that it would begin charging most subscribers receiving high-definition television service an HD Technology Fee in lieu of HD equipment leasing fees.¹³ Comcast's stated purpose for imposing the HD Technology Fee is to "help Comcast to recover the additional costs incurred in upgrading its network to provide HD television services. Comcast has invested millions of dollars in its network to provide these advanced video services to its customers."¹⁴ Thus, Comcast, by its own admission, has conceded that the HD Technology Fee is intended to recoup, at least in part, the costs of network upgrades. Where the FCC's rate regulations still apply, the lawful way for Comcast to recover the costs of such upgrades is to file an appropriate FCC Form 1235 with the LFAs.¹⁵ Indeed, Comcast has already filed a number of preliminary FCC Forms 1235 with local

¹² *Mountain Cable Co. d/b/a Adelphia Cable Communications; Better TV, Inc. of Bennington d/b/a Adelphia Communications; and Young's Cable TV Corp.: Appeal of Local Rate Order*, Memorandum Opinion and Order, 18 FCC Rcd 18436, 18439 n. 26 (2003).

¹³ See the Declaration of Richard D. Treich *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, at 5 (June 21, 2010) (the "Treich Declaration"), attached hereto as Exhibit 1. As discussed elsewhere in the LFAs' Comments, basic-only subscribers who receive HD programming will continue to pay HD equipment rental charges.

¹⁴ See, e.g., Attachment 4 to the Treich Declaration.

¹⁵ 47 C.F.R. § 76.922(j) (2009).

rate regulation authorities in Washington State and is charging or has charged add-on fees to recoup legitimate network upgrade costs.¹⁶ Accordingly, the LFAs are concerned that, at least in Washington, Comcast may be attempting to use the HD Technology Fee to double-recover upgrade costs for which it has already been reimbursed through network upgrade add-on charges levied pursuant to existing Forms 1235. In other words, Comcast's actions have the effect of evading the FCC's requirement that network upgrade costs to be paid by subscribers should be calculated using an FCC Form 1235 where such costs can be reviewed by local franchising authorities to ensure that they are reasonable and cost-based.¹⁷ To the extent that Comcast has incurred additional network upgrade costs in the Washington LFAs' franchise areas that it has not already recovered, Comcast should file additional or final Forms 1235, which include those costs, as required by the FCC, instead of levying an untested and allegedly unregulated technology fee. Under these circumstances, there is no legitimate business purpose for the monthly HD Technology Fee¹⁸ Comcast is now charging consumers in Washington State.

In Minnesota and Oregon, Comcast has never filed an FCC Form 1235 with the LFAs, but has instead historically recovered its network upgrade costs through FCC Forms 1240 used to calculate basic service rates. FCC Form 1240 is commonly used to recover non-equipment costs, including network upgrade costs, while FCC Form 1235 is typically used for significant upgrade costs not otherwise being recovered by the Form 1240. Comcast may therefore be double-recovering its upgrade costs in Minnesota and Oregon by imposing an HD Technology

¹⁶ Treich Declaration at 5.

¹⁷ See FCC Form 1235 Instructions for Completion of Abbreviated Cost of Service Filing for Cable Network Upgrades 1 (February 1996).

¹⁸ Treich Declaration at 4.

Fee¹⁹ that admittedly includes a network upgrade cost component. To avoid an unlawful or unjustified over-recovery, Comcast should have filed FCC Forms 1240 and/or Forms 1235 with the Minnesota and Oregon LFAs that accurately identify and validate Comcast's network upgrade expenditures associated with HD services, as required by FCC rules and precedent.²⁰ By effectively evading the FCC's rules, Comcast is attempting to recover alleged upgrade costs that it has not identified through a fee that it has not filed with the LFAs for review and substantiation. Given these facts, the only logical conclusion is that Comcast is seeking to avoid its obligation under FCC rules to prove the reasonableness of the HD Technology Fee. Comcast is clearly seeking to maximize profits at the expense of subscribers. The FCC should not countenance such behavior.

C. Comcast's HD Technology Fee Comingles Equipment and Service Costs in Contravention of the Cable Act's and the FCC's Unbundling Requirements.

One of the fundamental requirements of the FCC's rate regulation scheme is the unbundling of service and equipment costs.²¹ The primary purpose of this unbundling is to prevent cable operators from over-recovering costs and overcharging subscribers for basic cable service and associated equipment and installations. With regard to basic service, this means ensuring that subscriber rates are "reasonable" and accurately reflect the rates that would be charged for the basic service tier if a cable system is subject to effective competition.²²

Equipment and installations associated with the basic service tier are to be priced "on the basis of

¹⁹ The HD Technology Fee charged in Minnesota is \$7.00 per month, while the same fee in Oregon (and Washington) is \$6.00 per month.

²⁰ See, e.g., 47 C.F.R. §§ 76.922(a), (c)-(e); *Upper St. Clair Cablevision, Inc. d/b/a Adelphia Cable Communications*, Order on Reconsideration and Refund Plan Order, 17 FCC Rcd 5068, 5069 at ¶ 3 (2002).

²¹ Treich Declaration at 6.

²² 47 U.S.C. § 543(b)(1).

actual cost” plus a reasonable rate of return.²³ Basic service rates and related equipment and installation charges are subject to regulation by local franchising authorities in the absence of effective competition. To prevent evasions, the FCC “has interpreted the scope of this authority to include all equipment in a subscriber’s home, provided and maintained by the cable operator, that is used to receive the basic service tier, regardless of whether such equipment is additionally used for other services.”²⁴

Comcast’s March 2010 written notices to the Washington and Minnesota LFAs suggest that the HD Technology Fee includes both equipment and service components. Indeed, the notices specifically say that the HD Technology Fee replaces HD equipment leasing fees and includes network upgrade costs.²⁵ Because the HD receivers at issue are utilized to receive the basic service tier, among other services, the cost for such receivers should be included in FCC Forms 1205 and should be subject to review by local rate regulation authorities in rate regulated areas. It therefore appears Comcast is attempting to avoid regulatory scrutiny of its HD receiver equipment charges by imposing a potentially unregulated HD Technology Fee. This approach is wholly unnecessary, and lacks any true business justification, because Comcast could accurately recoup its HD receiver costs, along with a fair rate of return, through separate equipment charges, such as those Comcast has charged in the past and continues to charge for other equipment. Given these facts, there can be no doubt that Comcast’s actions are a prohibited evasion of the Cable Act and the FCC’s rate regulation rules.

²³ 47 U.S.C. § 543(b)(3).

²⁴ *See In the Matter of Revisions to Cable Television Rate Regulations; Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation; and Adoption of a Uniform Accounting System for the Provision of Regulated Cable Service, MM Docket Nos. 02-144, 92-266 and 93-215, CS Docket Nos. 94-28 and 96-157, Notice of Proposed Rulemaking and Order, 17 FCC Rcd 11550, 11553 (2002).*

²⁵ *See, e.g.,* Attachment 4 to the Treich Declaration.

D. Comcast’s Decision to Charge High-Definition Basic-Only Subscribers for a High-Definition Receiver Violates the FCC’s Equipment Averaging Rules and is a Prohibited Evasion.

Comcast has informed the North Suburban Communications Commission, one of the Minnesota LFAs, that “Comcast Limited Basic customers who watch HD basic channels and lease an HD cable box from us will not transition to a HD Technology Fee. They will continue to pay the HD Equipment Fee for each high-definition cable box they lease from us . . .”²⁶ Consequently, at least in Minnesota, basic-only subscribers who wish to view high-definition broadcast programming (which is, by definition, part of the basic service tier)²⁷ will apparently be forced to pay a \$7.00/month HD receiver rental fee instead of the \$1.00/month basic-only receiver charge listed on Comcast’s rate card.²⁸

Because high-definition broadcast channels properly reside on the basic service tier, equipment used to receive such channels is subject to local rate regulation authority and to the FCC’s equipment averaging rules -- the very same rules Comcast uses to justify the equipment rates in its national Form 1205.²⁹ Those rules specify that basic-only subscribers who use leased equipment to view basic service programming should be charged the basic-only converter rate.³⁰ Comcast’s decision to charge high-definition basic-only subscribers a \$7.00 monthly equipment rental fee, when the basic-only receiver charge is \$1.00/month, is therefore a violation of FCC rules. This conduct also rises to the level of a proscribed evasion because Comcast is effectively avoiding and ignoring applicable equipment averaging rules and has not provided a legitimate explanation for discriminating against certain basic-only subscribers.

²⁶ Treich Declaration at 7 and Attachment 5 thereto.

²⁷ 47 U.S.C. § 543(b)(7) (minimum contents of the basic tier include “any television broadcast that is provided by the cable operator to any subscriber,” regardless of transmission format.).

²⁸ See Attachment 2 and Attachment 5 to the Treich Declaration.

²⁹ Treich Declaration at 8.

³⁰ *Id.*

E. Comcast is Improperly Aggregating the Costs for High-Definition Receivers and High-Definition DVRs.

Comcast's rate cards for the LFAs list a single monthly price for the ongoing lease of a high-definition receiver -- \$8.00 in Oregon and Washington and \$7.00 in Minnesota.³¹ Comcast, however, has at least two types of HD receivers in its inventory to which the HD receiver fee applies. The first contains DVR capabilities, while the second does not. HD DVR receivers are more expensive to purchase from equipment manufacturers than standard HD receivers.³² Accordingly, it is evident that Comcast is aggregating different equipment costs into one HD receiver fee to develop the \$8.00 and \$7.00 charges. This can be problematic because both HD receivers and HD DVRs are used by basic-only and non-basic-only subscribers, which means cost aggregation is not permitted in rate regulated franchise areas.³³ In this regard, the FCC has specifically stated that "Congress intended to ensure that basic-only subscribers not bear the cost of equipment used by subscribers taking services in addition to basic. Therefore, pursuant to the statutory language, costs of equipment used by basic-only subscribers may not be aggregated with costs of equipment used by non-basic-only subscribers."³⁴ Thus, in numerous communities around the country (including many of the LFAs and their member cities) Comcast is violating the Cable Act and FCC rules and engaging in inappropriate evasive behavior that should be

³¹ Treich Declaration at 4 and Attachments 1-3 thereto.

³² Treich Declaration at 8.

³³ See, e.g., Section 623(a)(7) of the Cable Act, 47 U.S.C. § 543(a)(7) ("[A]ggregation shall not be permitted with respect to equipment used by subscribers who receive only a rate regulated basic service tier."); 47 C.F.R. § 76.923(c)(2).

³⁴ See *In the Matter of the Implementation of Section 301(j) of the Telecommunications Act of 1996: Aggregation of Equipment Costs By Cable Operators*, CS Docket No. 96-57, Report and Order, 11 FCC Rcd 6778, 6789 (1996).

stopped.³⁵ Indeed, if Comcast's pricing strategy is not invalidated, Comcast will be able to charge basic-only subscribers with standard HD receivers more than the maximum cost-based amount that would otherwise be permitted under FCC rules.

F. Comcast's Monthly DVR Recorder Service Charge is Evasive and Violates the FCC's Rate Rules.

According to Comcast's rate cards for the LFAs' franchise areas, Comcast charges a \$15.95 monthly DVR service fee to subscribers leasing an HD DVR in addition to the monthly equipment fee.³⁶ It is unclear what costs this particular fee is designed to recover, since all DVR functions are embedded in the capital cost of the DVR itself and that cost is fully recouped through the equipment rates calculated using FCC Form 1205 (since DVRs are utilized to access basic cable service).³⁷ Moreover, even if there are additional costs integrally associated with DVRs (*e.g.*, user authorization or storage expenses), those costs should be included in Comcast's national FCC Form 1205 and incorporated into maximum permitted equipment rates. It is therefore evident that the DVR service fee is a pure "junk fee" designed to generate revenue that would not be permitted under the FCC's equipment rules. Indeed, Comcast has not provided the LFAs with any probative evidence proving the DVR service fee has any relationship to actual costs Comcast incurs. In the absence of any cost-based justification or legitimate business purpose, it is obvious that Comcast is attempting to circumvent the FCC's rate regulations and

³⁵ *See, e.g.*, the Rate Order, 8 FCC Rcd 5631, 6006 at ¶ 70 ("Charges for leasing each type of remote control unit shall be designed to recover the operator's cost of purchasing and financing the remote and expected repair and service charges over the useful life of the equipment . . . Charges for leasing converters and all other equipment shall be calculated in the same manner as for remotes."); 47 C.F.R. § 76.923(a)(2) (For all equipment in a subscriber's home that is maintained by the operator, "[s]ubscriber charges for such equipment shall not exceed charges based on actual costs in accordance with the requirements set forth in this section."). *See also* Treich Declaration at 9.

³⁶ Treich Declaration at 9 and Attachments 1-3 thereto.

³⁷ *Id.* at 9.

the Cable Act's cost-based requirement for equipment and to enrich itself by over-recovering its actual DVR equipment costs (which costs have already been completely recovered via Comcast's FCC Forms 1205).

G. Comcast's High-Definition Additional Outlet Charge in Washington State is an Impermissible Evasion of the FCC's Rate Rules.

Comcast charges a \$6.50/month HD Technology Fee in the Washington LFAs' franchise areas for a primary HD outlet (other than for basic-only high-definition subscribers) and an \$8.00/month HD Technology Fee Additional Outlet fee for secondary HD outlets (not including basic-only HD homes).³⁸ Because HD outlets are used to receive HD broadcast programming included on the basic tier, and Comcast has not demonstrated any additional programming costs associated with such outlets, they should be treated as regulated equipment and their costs should be justified in Comcast's national FCC Form 1205.³⁹ This is particularly true, because HD outlets can be used to receive only the basic service tier of programming. When assessing the regulatory status of additional outlets, the FCC has consistently held that "equipment 'used to receive the basic service tier' is broadly interpreted and includes . . . connections for additional television sets and cable home wiring. Our expansive reading . . . means that equipment and installations used to receive both the basic tier and other services would be regulated according to actual cost guidelines."⁴⁰ Consequently, Comcast should have justified its \$8.00 HD

³⁸ *Id.* at 4-5 and Attachment 1.

³⁹ *Id.* at 4-5.

⁴⁰ Rate Order, 8 FCC Rcd 5631 at ¶ 67. *See also In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation, MM Docket No. 92-266*, First Order on Reconsideration, Second Report and Order and Third Further Notice of Proposed Rulemaking, 9 FCC 1164, 1187 (1993) ("We affirm our prior conclusion that Congress intended the actual cost standard to apply broadly to all equipment used to receive the basic service tier . . ."); *In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation, MM Docket No. 92-266*, Thirteenth Order on Reconsideration, 11 FCC 388, 403 (1995) ("Regulated equipment includes

Technology Fee Additional Outlet charge in its most recent FCC Form 1205, but did not. Under these circumstances, it appears that Comcast is attempting to evade the cost-based strictures of the FCC's equipment rules by charging a fee that has no relationship to Comcast's actual equipment or programming costs. The \$8.00 fee is particularly suspicious in light of the fact that Comcast's stated charge for an initial HD outlet is only \$6.50/month. To date, Comcast has not provided the LFAs with any credible explanation as to why fees for additional HD outlets should be greater than the fee for a primary digital outlet.⁴¹

The LFAs anticipate that Comcast will argue its \$8.00 additional HD outlet charge is an unregulated additional digital outlet based on prior FCC decisions.⁴² Those cases are inapposite and distinguishable from the instant case because they dealt with services the FCC determined were akin to cable programming services and premium services.⁴³ Here, the additional HD outlets at issue can be used to receive only the basic service tier, so the issue of additional outlets used to receive only non-regulated services is not raised. Accordingly, Comcast's HD Technology Fee Additional Outlet fee properly falls within the rate regulation jurisdiction of those rate regulation authorities in Washington not subject to effective competition and Comcast should therefore have included its additional HD outlet costs, if any, in the appropriate schedules

all of the equipment located in the subscriber's home, including . . . connections for additional televisions and other cable wiring used to obtain basic services."); and *Comcast Cablevision of Dallas, Inc., Order Setting Basic Equipment and Installation Rates (Farmers Branch, Texas), et al., DA 04-1703, Order*, 19 FCC Rcd 10628, 10635 (2004) ("Generally, an outlet through which the BST passes is subject to regulation by the franchising authority regardless of what other programming also passes through it.").

⁴¹ See the Treich Declaration at 4-5.

⁴² *Id.* at 5.

⁴³ See, e.g., *Comcast Cablevision of Dallas, Inc., Order Setting Basic Equipment and Installation Rates (Farmers Branch, Texas), et al., DA 04-3618, Order on Reconsideration*, 19 FCC Rcd 22686 (2004).

on its FCC Form 1205. Because it did not do so, the FCC must conclude that Comcast is engaging in unlawful evasive conduct.

III. COMCAST’S HD TECHNOLOGY FEE IS INCONSISTENT WITH THE SPIRIT AND LETTER OF SECTION 629 OF THE CABLE ACT AND THE FCC’S COMPETITIVE NAVIGATION DEVICE RULES.

When Congress enacted Section 629 of the Cable Act, 47 U.S.C. § 549, it “intended to create a competitive market for equipment used to access cable and other MVPD services.”⁴⁴

This important policy was achieved by requiring the FCC to “adopt regulations to assure the commercial availability, to consumers of multichannel video programming and other services offered over multichannel video programming systems, of converter boxes, interactive communications equipment, and other equipment used by consumers to access multichannel video programming . . . from manufacturers, retailers, and other vendors not affiliated with any multichannel video programming distributor.”⁴⁵ Comcast’s HD Technology fee is anti-competitive and runs afoul of both the intent of Section 629 and the specific limitations of Section 629(a) and the FCC’s rules.

Written documentation provided to the LFAs indicates that there is both an equipment component (*e.g.*, HD set-top device used to receive HD cable service, including HD channels on the basic tier) and a service component (network upgrades) to the HD Technology Fee.⁴⁶ The fee therefore deters consumers from purchasing third-party receivers and manufacturers from designing and constructing them because it is highly unlikely that most subscribers would

⁴⁴ *In the Matter of Revisions to Cable Television Rate Regulations; Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation; and Adoption of a Uniform Accounting System for the Provision of Regulated Cable Service*, MM Docket Nos. 02-144, 92-266 and 93-215, CS Docket Nos. 94-28 and 96-157, Notice of Proposed Rulemaking and Order, 17 FCC Rcd 11550, 11567 (2002).

⁴⁵ 47 U.S.C. § 549(a). *See also* 47 C.F.R. §§ 76.1202, 76.1204.

⁴⁶ *See* the Treich Declaration at 5-7, and Attachment 4 thereto.

choose to pay for receivers twice – once at retail and again in the HD Technology Fee. Such an outcome clearly contravenes the goals of Section 629 and the requirements of the FCC’s competitive navigation device rules.⁴⁷

Section 629 also specifies that multichannel video programming distributors, such as Comcast, cannot offer converters and interactive communications equipment to consumers unless “the system operator’s charges to consumers for such devices and equipment are separately stated and not subsidized by charges for any [video programming or other services].”⁴⁸ Comcast’s HD Technology Fee is inconsistent with this statutory limitation in at least two respects. First, because the HD Technology Fee is designed to be a substitute for equipment charges and actually contains HD equipment costs, Comcast’s charges are not “separately stated,” as required by Section 629(a). Second, the service component of the HD Technology Fee is arguably subsidizing HD equipment costs. This is illustrated by the fact that Comcast has stated that basic-only HD subscribers will continue to pay HD receiver charges of \$8.00/month in Washington and Oregon and \$7.00 month in Minnesota. The HD Technology Fee, which includes both an HD receiver and service expenses (*i.e.*, network upgrades), is \$7.00

⁴⁷ See, e.g., *Commercial Availability of Navigation Devices*, Final Rule, 63 Fed. Reg. 38,089, 38,090 (July 15, 1998) (codified at 47 C.F.R. pt. 76) (“The intended effect of these rules is to expand opportunities for consumers to purchase this equipment from sources other than the service provider.”); *Implementation of Section 304 of the Telecommunications Act of 1996, Commercial Availability of Navigation Devices*, Statement of Commissioner Powell, 13 FCC Rcd 14775, 14850 (1998) (“The real purpose of section 629 was to ensure that consumers are not hostages to their cable operators and can go elsewhere, if they choose, to obtain set-top equipment. As set forth in the conference report, [o]ne purpose of this section is to help ensure that consumers are not forced to purchase or lease a specific, proprietary converter box from the cable system or network operator.” (internal quotation marks omitted)); 47 C.F.R. § 76.1201.

⁴⁸ 47 U.S.C. § 549(a). See also 47 C.F.R. § 76.1206 (“Multichannel video programming distributors offering navigation devices . . . for sale or lease directly to subscribers . . . shall separately state the charges to consumers for such services and equipment.”)

in Minnesota and \$6.50/month in Washington and Oregon.⁴⁹ Because the basic-only HD receiver fee is greater than or the same as the HD Technology Fee, which includes more than just HD equipment, the equipment component of HD Technology Fee must be subsidized, in violation of Section 629(a).

Accordingly, as part of its public interest review of the Transaction, the FCC should carefully evaluate whether Comcast, if it were to own and control extremely valuable programming content, would consistently comply with the competitive objectives and requirements of the applicable program access rules, even if the FCC imposes specific conditions regarding those rules as part of any Transaction approval. To date, the record suggests that Comcast cannot be trusted to operate in a pro-competitive manner.

IV. COMCAST'S WRITTEN NOTICE TO THE WASHINGTON LFAS IS MISLEADING AND APPEARS TO BE A VIOLATION OF THE CABLE ACT AND THE FCC'S RULES.

Comcast's March 2010 written notice to the Washington LFAs stated that, effective April 1, 2010, Comcast would begin charging a \$6.50/month HD Technology Fee to most subscribers in lieu of monthly HD equipment rental fees.⁵⁰ Comcast apparently did not, however, inform the Washington LFAs or subscribers, in any specific written notice, that it would also begin charging an HD Technology Fee Additional Outlet Charge of \$8.00/month per HD outlet.⁵¹ As a consequence, there can be no doubt that Comcast's written notice was misleading because it did not explain to the Washington LFAs or subscribers what all relevant charges are or the true total cost for obtaining HD services throughout a home. Comcast's conduct may also violate 47 C.F.R. § 76.1603 and Section 632(c) of the Cable Act, 47 U.S.C. § 552(c), both of which require

⁴⁹ Treich Declaration at 4.

⁵⁰ See Attachment 4 to the Treich Declaration.

⁵¹ Treich Declaration at 4.

Comcast to disclose to subscribers, including the Washington LFAs, all rate changes in advance of their implementation. The facts in Washington State strongly suggest that Comcast did not satisfy this obligation.

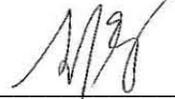
V. CONCLUSION.

The LFAs' Comments contain compelling evidence that Comcast has engaged in practices that are anti-competitive and designed to evade and violate federal laws and regulations. Under these circumstances, the LFAs question whether the Transaction should be approved, since Comcast's prior and ongoing conduct suggests that it will act outside the boundaries of the law until someone reins it in. Because Comcast is not willing to follow the pro-competitive strictures of the FCC's rate regulation rules and Section 629 of the Cable Act, the FCC must protect the public and prohibit Comcast from using its significant market power, should it acquire ownership and control of NBC Universal, Inc., to evade or flout critical program access rules. In the LFAs' opinion, the facts show that Comcast does not possess the character or legal qualifications needed to find that the Transaction is in the public interest. If the FCC ultimately decides to approve the Transaction, the LFAs respectfully request that the following conditions be imposed on Comcast and rigorously enforced: (i) Comcast should eliminate the HD Technology Fee it is charging; (ii) existing DVR service fees should be eliminated; (iii) basic-only subscribers should be charged the lowest rate available for set-top devices in accordance with the FCC's unbundling and equipment aggregation rules and decisions; (iv) Comcast should file preliminary and/or final FCC Forms 1235 for stated network upgrades associated with the provision of HD cable service in the LFAs' franchise areas and provide refunds to eligible subscribers, as appropriate; and (v) Comcast must properly unbundle HD receiver and HD DVR costs and rates.

CERTIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The undersigned signatory has read the foregoing Comments of the City of Seattle, Washington; the City of Tacoma, Washington; the City of Renton Washington; the City of Maple Valley, Washington; the City of Des Moines, Washington; the City of University Place, Washington; the City of Longview, Washington; the City of Issaquah, Washington; the City of Spokane, Washington; the City of Kirkland, Washington; the City of Milton, Washington; the City of Minneapolis, Minnesota; the City of Bloomington, Minnesota; the City of Coon Rapids, Minnesota; the City of Springfield, Oregon; the Metropolitan Area Communications Commission; the Rainier Communications Commission; the Ramsey/Washington Counties Suburban Cable Communications Commission II; the North Metro Telecommunications Commission; the North Suburban Communications Commission; and the South Washington County Telecommunications Commission and to the best of my knowledge, information and belief formed after reasonable inquiry, they are well grounded in fact and are warranted by existing law or a good faith argument for the extension, modification or reversal of existing law; and are not interposed for any improper purpose.

Respectfully submitted,



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Attorneys for the LFAs

June 21, 2010

EXHIBIT 1

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:

Applications of Comcast Corporation,
General Electric Company,
and NBC Universal, Inc.

MB Docket No. 10-56

For Consent to Assign Licenses or
Transfer Control of Licensees

DECLARATION OF RICHARD D. TREICH

I, Richard D. Treich, declare as follows:

1. I submit this declaration in support of the Comments (“Comments”) submitted by the City of Seattle, Washington, the City of Tacoma, Washington, the City of Renton, Washington, the City of Des Moines, Washington, the City of University Place, Washington, the City of Longview, Washington, the City of Issaquah, Washington, the City of Spokane, Washington, the City of Kirkland, Washington, the City of Milton, Washington, the City of Maple Valley, Washington, the City of Minneapolis, Minnesota, the City of Bloomington, Minnesota, the City of Coon Rapids, Minnesota, the City of Springfield, Oregon and the following municipal joint powers commissions in the above-captioned proceeding: the Metropolitan Area Communications Commission (an intergovernmental cooperative entity, which includes the cities of Banks, Beaverton, Cornelius, Durham, Forest Grove, Gaston, Hillsboro,

King City, Lake Oswego, North Plains, Rivergrove, Tigard, and Tualatin, Oregon, and unincorporated areas of Washington County, Oregon); the Rainier Communications Commission (an intergovernmental agency formed pursuant to Washington law, which includes the cities of Bonney Lake, Carbonado, DuPont, Fife, Milton, Orting, Pierce County, Puyallup, Ruston, Steilacoom, Sumner, Tacoma, University Place, and Wilkeson, Washington); the North Metro Telecommunications Commission (a municipal joint powers commission consisting of the cities of Blaine, Centerville, Circle Pines, Ham Lake, Lexington, Lino Lakes, and Spring Lake Park, Minnesota); the North Suburban Communications Commission (a municipal joint powers commission consisting of the cities of Arden Hills, Falcon Heights, Lauderdale, Little Canada, Mounds View, New Brighton, North Oaks, Roseville, St. Anthony, and Shoreview, Minnesota); the Ramsey/Washington Counties Suburban Cable Communications Commission II (a municipal joint powers commission consisting of the cities of Birchwood, Dellwood, Grant, Lake Elmo, Mahtomedi, Maplewood, North St. Paul, Oakdale, Vadnais Heights, White Bear Lake, White Bear Township, and Willernie, Minnesota); and the South Washington County Telecommunications Commission (a municipal joint powers commission consisting of the municipalities of Woodbury, Cottage Grove, Newport, Grey Cloud Island Township, and St. Paul Park, Minnesota) (collectively, the “Communities”) in the above-captioned matter. I am fully competent to testify to the facts set forth herein, and if called as a witness, I would testify to them.

2. I have served as CEO of Front Range Consulting, Inc. (“FRC”) since December 2002. I previously served as Senior Vice President, Rates and Regulatory Matters for AT&T Broadband (and its predecessor TCI Communications, Inc.). I was

also the Partner-in-Charge of KPMG Peat Marwick's national Cable Television and Utility consulting practices. I earned my Bachelor of Science in Business Administration from Susquehanna University in 1975.

3. I have over thirty years of experience in cable and utility rate regulation matters. I have testified in over 20 different states in 200 proceedings on utility regulatory matters involving cost-of-service and rate design proceedings. I have co-authored a book entitled *Gas Rate Fundamentals* on cost-of-service studies.

4. During part of my tenure with TCI and AT&T Broadband, I was the senior executive in charge of the regulatory group. My primary responsibilities in that capacity were to direct and approve all of the rate filings made by TCI and AT&T Broadband, to oversee and negotiate local cable television franchises and to manage TCI's and AT&T Broadband's mergers and acquisitions from a regulatory and franchising standpoint. My duties also included discussions with senior FCC staff on changes being proposed to the FCC regulatory filings.

5. Comcast Corporation, through its subsidiaries and affiliates (collectively, "Comcast"), has introduced a new purportedly unregulated fee called the "HD Technology Fee" in the Communities, which are located in Washington, Oregon and Minnesota. Written notices were sent to subscribers and the Communities from October 2009 to March 2010 with implementation dates beginning in January through May 2010. Based on my review of these notices and the corresponding rate cards and rate forms, I believe there are six problems with Comcast's HD Technology Fee and related charges:

- 1) the written notices sent to subscribers and local franchising authorities are misleading;
- 2) the additional outlet ("AO") charge for HD services is unsupported, notwithstanding

the fact that high-definition outlets are used to receive basic cable service (*e.g.*, high-definition local broadcast programming); 3) improper justification (*e.g.*, network upgrade costs) contained in the written notice; 4) bundling of service and equipment charges contrary to the intent of the 1992 Cable Act and the FCC’s rate rules; 5) the high-definition set-top device charge for HD basic-only subscribers is improper, excessive and inconsistent with FCC precedent; and 6) the aggregation of high-definition set-top devices and high-definition DVR devices is inappropriate because it forces certain subscribers to pay for features (*e.g.*, video recording) they do not have.

6. Table 1 below summarizes the equipment and services charges at issue for Washington, Oregon and Minnesota.

Table 1

Item	Washington ¹	Minnesota ²	Oregon ³
HD Converter	\$8.00	\$7.00	\$8.00
Basic Only Converter	\$1.00	\$1.00	\$1.00
HD Tech Fee	\$6.50	\$7.00	\$6.50
HD AO Fee	\$8.00	na	na

7. In the written notice given to the City of Renton⁴, Comcast identified the HD Technology Fee as being \$6.50/month. Nowhere in that rate notice to the City did

¹ Attachment 1, King County rate card

² Attachment 2, North Metro Telecommunications Commission rate card

³ Attachment 3, Metropolitan Area Communications Commission rate card and notice

Comcast mention the fact that the HD Technology Fee on all additional high-definition televisions would be \$8.00 per additional outlet per month as set forth in the relevant rate card. Even the City of Renton, when confronted with this fact, was unaware that subscribers had not been notified of the higher HD Technology Fee on additional high-definition televisions, let alone the twisted logic that an additional high-definition television somehow costs more to program than the first high-definition television.

8. As importantly, the digital additional outlet charge of \$8.00 in Washington should be considered a regulated equipment fee, but is not supported by either a Form 1205 or any separate rate justification under Federal Communications Commission (“FCC”) rules. I acknowledge that the FCC has held in several orders⁵ that digital additional outlet charges are unregulated; however, the facts in those cases are distinguishable from the circumstances present in this case because additional high definition outlets are now utilized by subscribers to receive high-definition broadcast channels, which are part of the basic service tier. Since additional high definition outlets are now associated with basic cable service programming, the charges for such outlets are subject to regulation. In this regard, additional high definition outlet charges must be cost-based in accordance with 47 C.F.R. § 76.923, and should be justified in Comcast’s national FCC Form 1205 through the inclusion of verifiable equipment and programming costs, if such costs truly exist. To date, however, Comcast has not supported its additional high definition outlet charges in a Form 1205, or otherwise furnished the

⁴ Attachment 4, Washington and Minnesota notices

⁵ See, e.g., *In the Matter of Comcast, Order Setting Basic Rates*, Order, DA 04-1703, 19 FCC Rcd 10628, 10631 ¶ 7 & 16 (2004); *In the Matter of Comcast, Order Setting Basic Rates*, Order on Reconsideration, DA 04-3618, 19 FCC Rcd 22686, 22687 ¶ 1 (2004).

Communities or the FCC with any programming or equipment cost data that prove Comcast's charges are reasonable and cost-based, as required by the FCC's rate regulation rules.

9. In the same March 2010 written notice to the Communities, Comcast stated "[t]his HD Technology Fee will help Comcast recover the additional costs incurred in upgrading its network to provide HD television service."⁶ It therefore appears Comcast is suggesting that this HD Technology Fee will help Comcast recover "upgrade" costs. This is potentially problematic, because in Renton and other Washington communities, Comcast has already recovered (or is in the process of recovering) its network upgrade costs through an "add-on" charge calculated using the FCC's Form 1235. Accordingly, it seems as though Comcast is attempting to double-recover upgrade costs in various Washington franchise areas. Even if Comcast has, in fact, implemented some new system upgrades that are necessary to deliver the HD services, which are not the subject of an existing Form 1235, the proper and lawful step to file a new/another FCC Form 1235 and/or an FCC Form 1240 so that subscribers would only be charged a proper cost-based rate for these particular upgrades (if they actually exist) instead of an unregulated fee that is not subject to regulatory review and may over-recover Comcast's costs.

10. In Minnesota and Oregon, if Comcast is truly incurring new network upgrade costs associated with rolling out high-definition cable services, the proper mechanism for recovering those costs is to file an FCC Form 1235 and/or an appropriate FCC Form 1240 with local rate regulation authorities. That way, as indicated above, the

⁶ See Attachment 4.

Minnesota and Oregon Communities would have an opportunity to review Comcast's stated costs and to determine whether they are accurate and appropriate so as to ensure that basic cable service subscribers are not overcharged or improperly subsidizing expenses not associated with basic cable services. Unfortunately, Comcast has chosen not to file FCC Forms 1235 with local rate regulation authorities in Minnesota and Oregon.

11. One of the big changes resulting from the Cable Television Consumer Protection and Competition Act of 1992 (the "1992 Cable Act") was the separation/unbundling of the equipment and service costs and requiring equipment rates to be based on actual costs plus a fair rate of return. As a result, \$4.95 monthly remote control fees were eliminated and replaced with \$0.25 monthly remote control fees or thereabout that reflected actual costs. Comcast has, with this new HD Technology Fee, bundled equipment costs (*i.e.*, set-top boxes) and a service fee (*i.e.*, network upgrade costs) into one charge. It would therefore appear that Comcast is reverting to the days before the 1992 Cable Act and commingling equipment and service costs in contravention of the letter and the spirit of the FCC's rate regulation rules. The end result is a very questionable, and quite possibly unlawful, HD Technology Fee that lacks transparency and any justification.

12. Equipment and service rates should continue to be kept separate so that: (i) cross-subsidies do not occur and equipment charges are reasonable and cost-based; and (ii) customers can evaluate service and equipment costs and make informed decisions about selecting a particular service and/or purchasing compatible equipment at a retail location versus renting equipment from Comcast. By imposing the HD Technology Fee,

which includes equipment costs, Comcast is effectively impeding the commercial availability of navigation devices because subscribers would be forced to pay for the same equipment twice – once at retail and again through the HD Technology Fee. Moreover, the equipment component of the HD Technology Fee may very well exceed the cost-based limits imposed through the 1992 Cable Act on equipment that is associated with the basic service tier.

13. Comcast has also violated the FCC’s equipment averaging rules by charging basic-only customers that have a high-definition converter box a rate that is greater than the basic-only converter charge.⁷ In an e-mail response to the North Suburban Communications Commission, Comcast stated “Comcast Limited Basic customers who watch HD basic channels and lease an HD cable box from us will not transition to a HD Technology Fee. They will continue to pay the HD Equipment Fee for each high-definition cable box these lease from us because they do not purchase a level of service that includes advanced HD features provided as part of higher levels of service.”⁸ High-definition local broadcast channels are part of the basic service tier. Consequently, in rate regulated jurisdictions, the FCC’s equipment averaging rules (which Comcast uses to support its national FCC Form 1205) require that any basic-only subscriber that uses leased equipment in order to view the basic service tier should be charged the basic-only converter price.⁹ According to the April 18, 2010 e-mail

⁷ See *In the Matter of Implementation of Section 301(j) of the Telecommunications Act of 1996, Aggregation of Equipment Costs by Cable Operators*, Report and Order, 11 FCC Rcd 6778, 6789 ¶ 23 (1996) (“Aggregation Order”).

⁸ Attachment 5

⁹ See Aggregation Order, 11 FCC Rcd at 6789 ¶ 23.

response from Comcast, it appears Comcast is not following the required practice for basic-only customers in contravention of FCC rules and the 1992 Cable Act.

14. Further complicating the problem with the equipment price for the high-definition equipment is that Comcast has apparently improperly aggregated two different types of equipment under the high-definition receiver banner. Specifically, Comcast, in its Form 1205, has commingled both HD converter costs and HD DVR converter costs into one high-definition equipment price. An HD DVR is more expensive than a plain high-definition converter. As a result of Comcast's improper equipment cost aggregation, a high-definition customer leasing a high-definition box from Comcast is subsidizing the HD DVR subscriber by paying a portion of the higher cost of HD DVR receivers through the single high-definition receiver rate. Stated differently, under Comcast's current rate scheme, customers with a high-definition set-top box are paying for DVR features they are not receiving.

15. The FCC addressed the aggregation of equipment in 1993 when it stated in its initial Rate Order¹⁰ “[c]harges for leasing each type of remote control unit shall be designed to recover the operator's cost of purchasing and financing the remote, and expected repair and service charges over the useful life of the equipment. Expected repair and service charges are to be determined by multiplying the estimated average number of repair and service hours per remote by the HSC. Charges for leasing converter boxes and all other equipment shall be calculated in the same manner as for remotes.”

¹⁰ See *In the Matter of Implementation of Sections of the Cable Television Consumer Protection and Competition Act of 1992: Rate Regulation*, MM 92-266, Report and Order and Further Notice of Proposed Rulemaking, 8 FCC Rcd 5631, 6006 ¶¶ 70 (1993).

The aggregation of two different HD set top boxes – one with a DVR and one without clearly violates what the FCC ordered in 1993 when rate regulation was begun.

16. In addition, Comcast is improperly charging a DVR service fee to its DVR converter customers. According to the Washington, Minnesota and Oregon rate cards, Comcast charges a monthly service fee of \$15.95 for a HD DVR in addition to its monthly high-definition equipment fee. The entire functionality of the DVR feature is embedded in the capital cost of the high-definition converters and is fully recovered in Comcast’s national FCC Form 1205 in rate regulated areas. If any ongoing costs for user authorization, storage or similar charges are incurred by Comcast for the DVR features, these also should be included in the Form 1205 in areas that are not subject to effective competition.¹¹ There is no “service” component to the DVR feature and it appears the Comcast is using an unregulated service fee to over-recover its equipment costs for the DVR feature, which are already fully recovered in the Form 1205.

17. I declare under penalty of perjury that the facts stated herein, are true and correct to the best of my knowledge and belief.

¹¹ See FCC Form 1205, Determining Regulated Equipment and Installation Costs, available at <http://www.fcc.gov/Forms/Form1205/1205.xls>.

This declaration was executed on 21th day of June, 2010 at Castle Rock, CO.

A handwritten signature in black ink, appearing to read "Richard D. Treich". The signature is written in a cursive style with a large, stylized initial "R" and "T".

Richard D. Treich

Attachment 1

SPRING 2010

Rate Card & Channel Lineup

King, Pierce and
Snohomish Counties



WHAT'S INSIDE



1

Enjoy non-stop family entertainment with far more choices, local and national news, free movies, and more. No expensive equipment to buy or install, plus:

On Demand:

Thousands of movies and shows that are ready to watch whenever you want—most are FREE!

6

AnyRoom™ On Demand:

Available to Comcast Digital TV customers—start watching an On Demand program in one room and finish watching it from another TV with AnyRoom On Demand.

8

High-Definition TV:

Enjoy brilliant colors and clarity with channels like ESPN HD, History HD and many more.

10

Digital Video Recorder (DVR):

Easily record and watch your favorite programs without tapes or VCRs. Control Live TV!

12

Premium channels available:

Enjoy feature films, award-winning TV series, and more from HBO®, Showtime®, Starz®, Cinemax®, and The Movie Channel®.

13

On-screen program guide:

Search by program name and see all the times a show is airing.

Parental controls:

Conveniently block programming by content and by rating. A PIN makes it just as easy for you to still watch what you want.

46 commercial free music channels:

CD-quality music stations programmed by category- from 70's Rock to Jazz.



Limited Cable ●

Local broadcast channels and popular cable networks. Digital channels may require a separate Set-Top Receiver and Remote, available for an additional charge.

Seattle.....	\$ 12.55
Vashon Island.....	\$ 13.57
Parts of Renton.....	\$ 13.77
Des Moines.....	\$ 13.80
Parts of Unincorporated King County.....	\$ 13.91
Mill Creek.....	\$ 13.98
Newcastle, areas of Unincorporated King County.....	\$ 14.01
Parts of Renton.....	\$ 14.08
Mercer Island.....	\$ 14.10
Mukilteo.....	\$ 14.11
Edgewood, Ft. Lewis, Milton, Steilacoom, and Puyallup.....	\$ 14.19
Brier.....	\$ 14.29
Tukwila.....	\$ 14.35
Sammamish, Issaquah (South Cove), areas of Unincorporated King County ..	\$ 14.40
Auburn.....	\$ 14.52
Kent, Redmond.....	\$ 14.53
Burien.....	\$ 14.63
Bonney Lake, Dupont, Fox Island, South Prairie, Sumner and areas of Unincorporated Pierce County.....	\$ 14.95
Lake Forest Park.....	\$ 15.16
Covington, Federal Way, Maple Valley, areas of Unincorporated King County.....	\$ 15.24
Areas of Marysville.....	\$ 15.29
Lake Stevens, Unincorporated Monroe, and areas of Marysville.....	\$ 15.34
Fall City, areas of Unincorporated King County.....	\$ 15.49
Areas of Unincorporated King County.....	\$ 15.66
Bothell, Kirkland, Bellevue, Yarrow Point, Hunts Point, Medina, Beaux Arts, Woodinville, Kenmore, areas of Unincorporated Lynnwood, Clyde Hill, Buckley, Orting, Wilkeson, and areas of Unincorporated Pierce County.....	\$ 15.82
McChord AFB, Roy, Carbonado, Gig Harbor and Eatonville.....	\$ 16.30
Mountlake Terrace, Areas of Edmonds, Incorporated Lynnwood and areas of Unincorporated Lynnwood.....	\$ 16.31
Incorporated Monroe, Sultan.....	\$ 16.37
Arlington and areas of Unincorporated Snohomish County.....	\$ 16.84
Areas of Unincorporated King County (Lee Hill).....	\$ 16.91
Everett, Granite Falls, Goldbar, Incorporated Snohomish, Woods creek, Startup.....	\$ 17.57
Shoreline, areas of Edmonds, Woodway, areas of Unincorporated Snohomish County.....	\$ 17.69
SeaTac, Normandy Park, Black Diamond, Algona, Pacific, Enumclaw.....	\$ 17.81
Carnation.....	\$ 18.03
Snoqualmie, North Bend.....	\$ 18.60

Digital Economy ●●

Limited Cable and Digital Economy channel lineups, Interactive Programming Guide, Pay-Per-View Access, 1 Digital Set-Top Receiver, and Remote.

\$29.99* - \$39.99

* \$29.99 w/Internet or Voice Service

Digital Starter ●●●

Limited Cable, Digital Economy and Digital Starter channel lineups, Interactive Programming Guide, On Demand, Pay-Per-View Access, 1 Digital Set-Top Receiver, Remote and Digital to Analog Service on up to two outlets.

\$57.45

Digital Preferred ●●●●

Limited Cable, Digital Economy, Digital Starter and Digital Preferred channel lineups, Interactive Programming Guide, On Demand, Pay-Per-View access, 1 Digital Set-Top Receiver, Remote and Digital to Analog service on up to two outlets.

\$74.44



Digital Preferred Plus ●●●●●●●●

Limited Cable, Digital Economy, Digital Starter and Digital Preferred channel lineups, Interactive Programming Guide, On Demand, Pay-Per-View access, 1 Digital Set-Top Receiver, Remote and Digital to Analog service on up to two outlets. Also includes Starz and HBO Premium Services. Each premium service includes its own On Demand content!

\$106.44

Digital Premier ●●●●●●●●●●

Limited Cable, Digital Economy, Digital Starter, Digital Preferred and Sports Entertainment channel lineups, Interactive Programming Guide, On Demand, Pay-Per-View access, 1 Digital Set-Top Receiver, Remote and Digital to Analog service on up to two outlets. Also includes Starz, HBO, Cinemax and Showtime Premium Services. Each premium service includes its own On Demand content!

\$126.44

Sports Entertainment ●

Access to hundreds of live games from the NBA, NFL, NHL, College Football and College Basketball. Digital Set-Top Receiver or CableCARD and purchase of Limited Cable required.

\$5.99

Premium Services ●

Digital Set-Top Receiver or CableCARD and purchase of Limited Cable required. Each premium service includes multiple channels and its own On Demand content when viewed with a Digital Set-Top Receiver.

Starz Package

\$17.99

HBO Package

\$17.99

Cinemax Package

\$17.99

Showtime Package

\$17.99

The Movie Channel Package

\$17.99

Playboy

\$19.99

On Demand & Pay-Per-View¹

Digital Set-Top Receiver and purchase of Limited Cable required.

Free On Demand.....	FREE with Qualifying Digital TV Package
Premium On Demand.....	FREE with Premium Service Subscription
Library Movies (per movie).....	\$ 2.99-3.99
New Release Movies (per movie).....	\$ 4.99-6.99
Uncensored TV (per showing).....	\$ 5.99-9.99
Adult (per showing).....	\$ 12.99-14.99
Events (per showing).....	Prices Vary

On Demand Monthly Subscriptions

Digital Set-Top Receiver and purchase of Limited Cable required.

Bollywood Hits.....	\$ 12.99
Bollywood Hits (when purchased with Zee TV).....	\$ 9.99
Disney Family Movies.....	\$ 5.99
Filipino.....	\$ 7.99
Filipino (when purchased with The Filipino Channel).....	\$ 5.99
here!.....	\$ 7.99
Howard Stern.....	\$ 10.99
Too Much For TV.....	\$ 14.99
WWE Classics.....	\$ 7.99

¹ Price of Pay-Per-View and On Demand movie or event is displayed prior to the completion of the Pay-Per-View or On Demand ordering process.

- Limited Cable
- Digital Economy
- Digital Starter
- Digital Preferred
- Sports Entertainment
- Premium Service



Comcast en Español

Selecto Total ●●●

40 Digital Spanish Language channels and 5 Spanish Language Digital Music channels. Requires subscription to Limited Cable and Digital Set-Top Receiver or CableCARD.

\$14.99

CableLatino Package ●●●

Limited Cable, Selecto Total, On Demand, Pay-Per-View access, Interactive Programming Guide, 1 Standard Digital Set-Top Receiver and Remote.

\$29.99

CableLatino Completo Local Package ●●●●●

Digital Starter and Selecto Total channel lineups, On Demand, Pay-Per-View access, Interactive Programming Guide, 1 Standard Set-Top Receiver and Remote.

\$64.99

CableLatino Completo Local con HBO Package ●●●●●●●

Digital Starter and Selecto Total channel lineups, Encore channels, HBO (including HBO Latino) and Starz Premium Services, On Demand, Pay-Per-View access, Interactive Programming Guide, 1 Standard Set-Top Receiver and Remote.

\$79.99

International Premium Services

Digital Set-Top Receiver or CableCARD and purchase of Limited Cable required.

The Filipino Channel

\$11.99

TV Japan

\$24.99

Zee TV

\$14.99

Saigon Broadcasting Television Network

\$14.99

TV5monde Usa

\$9.99

Russian Television Network

\$14.99

KO-AM TV

\$14.99

Additional Digital TV Services (per month)

Family Tier	\$	14.99
12 family friendly channels, Interactive Programming Guide and Digital FM Radio Stations. Requires subscription to Limited Cable, 1 Standard Digital Set-Top Receiver and Remote.		
Digital to Analog Service, 1st and 2nd Outlets ¹	\$	0.00
Digital to Analog Service, Additional Outlets ¹	\$	1.99
HD Technology Fee	\$	6.50
HD Technology Fee Additional Outlet	\$	8.00
Digital Video Recorder (Standard-Definition DVR) ²	\$	8.95
Digital Video Recorder (High-Definition, includes HD Technology Fee)	\$	15.95
Digital Video Recorder (High-Definition DVR) ²	\$	15.95
Digital Additional Outlet Service	\$	6.10

Equipment & Options (per month)

Remote Control (all types)	\$	0.15
Limited Cable Customer Equipment ³	\$	1.00
Standard Digital Set-Top Receiver ⁴	\$	3.20
HD Set-Top Receiver ⁴	\$	8.00
2nd CableCARD for Multiple CableCARD Device	\$	1.60
Channel Guide Magazine	\$	3.50



Installation & Repair ⁵

Home Installation (Wired)	\$	23.99
Home Installation (Unwired)	\$	33.99
Digital TV Self-Installation Kit (with shipping)	\$	24.90
Digital TV Self-Installation Kit (without shipping)	\$	14.95
Additional Connection at Time of Initial Install	\$	12.99
Additional Connection Requiring Separate Trip	\$	20.99
Move an Outlet	\$	16.99
Hourly Service Charge	\$	30.99
Upgrade or Downgrade of Optional Services (Addressable)	\$	1.99
Upgrade of Optional Services Requiring Separate Trip	\$	14.99
Downgrade of Optional Services Requiring Separate Trip	\$	9.99
Connect VCR/DVD at Time of Initial Install	\$	5.99
Connect VCR/DVD Requiring Separate Trip	\$	13.35
Reconnection of Service	\$	23.99
Service Call	\$	27.99
Reactivate Video Service/Equipment	\$	1.99
Service Protection Plan (per month)	\$	1.45

Miscellaneous

Non-Sufficient Funds Charge	\$	25.00
Field Service Charge	\$	15.00
Late Fee to Delinquent Accounts at 38 Days	\$	5.99
Additional Late Fee to Delinquent Accounts at 68 Days	\$	5.99
Transaction Fee ⁶	\$	5.99
Purchase A/B Switch	\$	10.00

Unreturned Equipment Fees

Please contact 1-800-COMCAST for questions regarding equipment replacement charges.

¹ Requires subscription to Digital Starter or higher tier of service.

² Equipment for additional outlets may also require the Digital Additional Outlet Service fee.

³ Customers who subscribe to Limited Cable only.

⁴ Customer who subscribe to Limited Cable with additional digital video services.

⁵ For standard installations only. Custom installations, including wall fishing, extensive drop-in ceilings, basements and crawl spaces are billed at the Hourly Service Charge rate.

⁶ A Transaction Fee will be charged for any payment made by phone with a Customer Care Representative.

- Limited Cable
- Digital Economy
- Digital Starter
- Premium Service
- Selecto Total



Speeds you have to experience to believe, plus FREE online extras!

Blazing Fast Speed:

Compare how much faster you can go online with amazing download speeds up to 50 Mbps. It's way faster than DSL!

Norton™ Security Suite powered by Norton360™:

Norton Security Suite gives you a whole series of tools to help keep you, your family and your home computers safe, protected and virus-free. Up to a \$160 value, included with your Comcast High-Speed Internet subscription.

PowerBoost®:

PowerBoost® is a Comcast network technology that enables you to experience faster connection speeds while you are downloading and uploading large files to the Internet.

E-mail for all:

Keep the entire family connected with up to 7 e-mail accounts.

Economy 1 Mbps/384 Kbps	Entry Level Internet Connection • Surf the net • Pay Bills	\$ 24.95	\$ 34.95
Performance 12 Mbps/2 Mbps	Basic Online Activities • Download Music • Upload Photos	\$ 42.95	\$ 54.95
Blast!® 2 16 Mbps/2 Mbps	Advanced Online Media Use • Stream HD Movies • Download/Upload large files	\$ 52.95	\$ 64.95
Ultra 2 22 Mbps/5 Mbps	Multiple Simultaneous Users • Streaming HD Movies, and downloading large files	\$ 62.95	\$ 74.95
Extreme 2 50 Mbps/10 Mbps	Internet Experts and Professionals • Hardcore gamers • User generated content sharing	\$ 99.95	\$ 111.95

Equipment & Options (per month)

Modem Rental ³	\$ 5.00
Comcast Certified Wireless Home Networking Router Rental ³	\$ 2.00
Comcast Certified Wireless Home Networking Gateway Rental ³	\$ 5.00
Comcast Certified Wireless-N Home Networking Router Rental ³	\$ 5.00
Additional IP Address	\$ 4.95
Up to 4 Additional IP Addresses	\$ 9.90

Installation & Repair

Premium or Gaming Installation	\$ 99.99
Internet Self-Installation Kit (with shipping)	\$ 39.90
Internet Self-Installation Kit (without shipping)	\$ 29.95
Unwired Outlet	\$ 12.99
Home Networking Installation (Up to 5 Computers)	\$ 149.99
Upgrade Home Networking Equipment Requiring Separate Trip	\$ 20.99
Installation of PC Cards, Separate Trip No Card	\$ 74.99
Reconnection of Service	\$ 23.99
Service Call	\$ 27.99
Additional Connection Requiring Separate Trip	\$ 20.99



Move an Outlet	\$ 16.99
Reactivate Internet Service/Equipment	\$ 4.00
Service Protection Plan (per month)	\$ 1.45

Miscellaneous

Modem Purchase	\$ 99.99
Comcast Certified Wireless Home Networking Gateway Purchase	\$ 179.99
Wireless Adapter Purchase	\$ 30.00
Wireless-N Adapter Purchase (PCMCIA)	\$ 59.99
Wireless-N Adapter Purchase (USB)	\$ 69.00
Late Fee to Delinquent Accounts at 38 Days	\$ 5.99
Additional Late Fee to Delinquent Accounts at 68 Days	\$ 5.99
Non-Sufficient Funds Charge	\$ 25.00
Transaction Fee ⁴	\$ 5.99

Unreturned Equipment Fees

Please contact 1-800-COMCAST for questions regarding equipment replacement charges.

Comcast High-Speed 2go is an exciting new mobile broadband service that provides blazing fast internet connectivity on the fastest mobile wireless network when you're out and about.

Metro 4G	\$ 40.00	\$ 60.00	\$ 82.95
Nationwide 3G/4G	\$ 55.00	\$ 75.00	\$ 97.95

Installation & Repair

Mobile Broadband Device Protection Plan	\$ 4.99
High-Speed 2Go Wireless Activation Fee	\$ 49.00
Mobile Broadband Standard Shipping & Handling	\$ 9.95
Mobile Broadband Priority Shipping & Handling (optional)	\$ 29.95

Miscellaneous

4G Mobile Broadband Device Purchase	\$ 125.00
4G/3G Mobile Broadband Device Purchase	\$ 125.00
3G Overage (above 5GB/mo)	\$ 0.10/MB
Domestic 3G Roaming (above 100MB/mo)	\$ 1.00/MB
International 3G Roaming Canada & Mexico	\$ 20/10MB
Other countries where service is available	\$ 20/5MB
Late Fee to Delinquent Accounts at 38 Days	\$ 5.99
Additional Late Fee to Delinquent Accounts at 68 Days	\$ 5.99
Non-Sufficient Funds Charge	\$ 25.00
Transaction Fee ⁴	\$ 5.99

¹ Cable modem required.

² May require a DOCSIS 3.0 certified modem rental or purchase. Comcast Home Networking customers may also require an 802.11n Wireless-N Router rental.

³ Call Comcast for details about purchasing a cable modem or Comcast Certified Home Networking Device and adapters. Purchased cable modems must be from Comcast's approved modem list, so as to meet DOCSIS certification and other Comcast specific equipment requirements. Approved modem list located online at <http://customer.comcast.com/Pages/FAQViewer.aspx?seoid=approved-cable-modems>, or go to <https://customer.comcast.com> and search for Approved Cable Modems. All Comcast Home Networking accounts require rental or purchase of a Comcast Certified Home Networking Device and may require purchase of adapters (up to 4).

⁴ A Transaction Fee will be charged for any payment made by phone with a Customer Care Representative.



Home Phone Service rated #1 in call clarity*—so no word goes unheard. It's easy to switch, keep your number and save money.

CDV with HSI and TV	\$ 39.95	\$ 24.95
CDV with HSI or TV	\$ 44.95	\$ 24.95
CDV Only	\$ 44.95	\$ 34.95
Voice Mail	✓	Available for \$3.95 per month
Unlimited Domestic Long-Distance Calling	✓	Available for \$.05 per minute
Unlimited Local Calling	✓	✓
Call Waiting	✓	✓
3-Way Calling	✓	✓
Caller ID	✓	✓
Caller ID with Call Waiting	✓	✓
Call Screening	✓	✓
Caller ID Blocking	✓	✓
Call Return	✓	✓
Anonymous Call Rejection	✓	✓
Repeat Dial	✓	✓
Call Forwarding Selective	✓	✓
Call Forwarding Variable	✓	✓
Speed Dial	✓	✓

* Call clarity rating based on November 2008 independent study by Wave 6 Study.

Carefree Minutes™ (per month) ²

Carefree Minutes™ service allows the completion of 100 minutes (300 minutes for Worldwide plan) of customer-originated calls to landline phones in any of the international regions below for a fixed monthly rate.

Mexico 100	\$ 4.95
Western Europe 100	\$ 4.95
Asia 100	\$ 4.95
Latin America 100	\$ 9.95
Worldwide 300	\$ 14.95

Equipment & Options

Voice Equipment (EMTA) Rental (per month)	\$ 5.00
Additional Line With Calling Features (per month)	\$ 20.00
Additional Line Without Calling Features (per month)	\$ 10.00
Single Directory Listing	Included
Non-Published Directory Service (per number)	\$ 1.50
Non-Listed Directory Service (per number)	\$ 0.50
Domestic Directory Assistance (3 Listings Per Call)	\$ 0.99
Domestic Directory Assistance with Call Completion	\$ 2.49
International Directory Assistance – Per Call (1 Listing Per Call) ..	\$ 4.99
International Operator Services – Per Call (1 Listing Per Call)	\$ 4.99
International Calls	Varies

Installation & Repair

Standard Comcast Digital Voice Installation	\$ 99.00
Service Activation Charge	\$ 29.95
Phone Self-Installation Kit (with shipping)	\$ 39.90
Phone Self-Installation Kit (without shipping)	\$ 29.95
New/Relocation/Reconfigure Phone Jack	\$ 49.99
Same Trip, additional New/Relocation/Reconfigure Phone Jack ...	\$ 19.95
Reconnection of Service	\$ 23.99
Service Call	\$ 27.99
Non-Published and Non-Listed Set-up Fee	\$ 5.00
Reactivate Digital Voice Service/Equipment	\$ 4.00
Service Protection Plan (per month)	\$ 1.45

Miscellaneous

Voice Equipment (DOCSIS 2.0 EMTA) Purchase	\$ 99.00
Voice Equipment (DOCSIS 3.0 EMTA) Purchase	\$ 149.00
Late Fee to Delinquent Accounts at 38 Days	\$ 5.99
Additional Late Fee to Delinquent Accounts at 68 Days	\$ 5.99
Non-Sufficient Funds Charge	\$ 25.00
Transaction Fee ³	\$ 5.99

Unreturned Equipment Fees

Please contact 1-800-COMCAST for questions regarding equipment replacement charges.

¹ Requires an eMTA from Comcast.

² Available only with Comcast Unlimited or Local with More. Each additional minute above the 100 (300 for Worldwide plan) will be charged at the specific country retail rate. Please visit www.comcast.com/cdv/termsofservice for country-specific rates.

³ A Transaction Fee will be charged for any payment made by phone with a Customer Care Representative.



Welcome to a world where TV, Phone and Internet work together.

Universal Address Book powered by Plaxo

Comcast's Universal Address Book makes it easy to house all of your contacts and calendars—from your e-mail accounts, computer, and cell phone—in one convenient spot. Straightforward, simple to use and accessible from just about anywhere, this is the only address book you'll ever need.

Comcast.net

Enjoy full access to Comcast.net, where you can share photos, listen to your favorite music, shop, and play games. Check TV listings and access over 130,000 news and entertainment videos from Fox Sports, E!, and more.

Universal Caller ID

As a Comcast Digital Voice and Digital TV and/or High-Speed Internet customer, you get the convenience of Universal Caller ID on your TV and/or computer. It's available to you at no additional charge.

SmartZone® Communications Center

Access your e-mail, Voice Mail and address book in one convenient place—Comcast.net! The new SmartZone™ Communications Center has a fresh, streamlined design and enhanced features sure to make your life easier. Quickly check your e-mail and voice mail from the same place, manage your accounts and connect your address books into one Universal Address Book.

The Comcast mobile app for iPhone™ and iPod touch®

The power of Comcast plus the versatility of the iPhone™ and iPod touch® means you can keep the things that matter most right by your side.

- Comcast.net e-mail
- Comcast Voice Mail
- What's on TV
- On Demand

Download the Comcast App now at www.comcast.net/iphone

Fancast XFINITY TV

Fancast XFINITY TV provides access to additional TV shows and movies at no extra cost based on the level of your Digital TV subscription. Certain Fancast XFINITY TV content may also be available before it airs for the first time on premium networks (HBO, Showtime, etc.). Fancast XFINITY TV content is available through www.fancast.com.



The new Comcast Triple Play: 3 great products that work together for just one low price. See page 13 for your complete channel lineup.

Value Triple Play ● 1 L

Digital Starter Video Service, Economy Internet Service and Comcast Digital Voice® Local with More®.

Standard monthly price for this bundle is \$105.65

Starter XF ● 12 U

Digital Starter Video Service with Movieplex, 1 set-top box and remote, Performance High-Speed Internet Service and Comcast Digital Voice Unlimited.

SurePrice monthly price for this bundle is \$114.99

Standard monthly price for this bundle is \$129.99

HD Preferred XF ● ● ● ● 12 U

Digital Preferred Video Service with HD, 1 HD set-top box and remote, Starz®, Performance High-Speed Internet Service and Comcast Digital Voice Unlimited.

SurePrice monthly price for this bundle is \$134.99

Standard monthly price for this bundle is \$149.99

HD Preferred Plus XF ● ● ● ● ● 16 U

Digital Preferred Video Service with HD, 1 HD set-top box and remote, HBO®, Starz®, Blast!® High-Speed Internet Service and Comcast Digital Voice Unlimited.

SurePrice monthly price for this bundle is \$154.99

Standard monthly price for this bundle is \$169.99

HD Premier XF ● ● ● ● ● ● ● ● ● 16 U

Premier Video Service with HD, 1 HD DVR set-top box and remote, HBO®, Showtime®, Starz®, Cinemax® and the Sports Entertainment Package, Blast!® High-Speed Internet Service and Comcast Digital Voice Unlimited.

SurePrice monthly price for this bundle is \$189.99

Standard monthly price for this bundle is \$199.99

Digital TV Services

- Starter
- Preferred
- HD Set-Top Receiver
- Premium Service
- High-Definition DVR
- Sports Entertainment Package

Internet Services

- 1 Economy
- 12 Performance High-Speed
- 16 Blast® High-Speed

Digital Voice Services

- L Local with More®
- U Unlimited

SurePrice monthly price is only available to customers that have XF Triple Play 12 month promotional packages.



Comcast Locations:

Auburn Cable Store

4020 Auburn Way North
Auburn, WA 98002
M-F 9am-6pm, Sat 9am-5pm

Lynnwood Cable Store

15815 25th Avenue West
Lynnwood, WA 98087
M-Sat 9am-7pm

Seattle Cable Store

1140 N. 94th Street
Seattle, WA 98103
M-F 9am-7pm, Sat 9am-5pm

Alderwood Mall Kiosk

3000 184th Street Southwest
Lynnwood, WA 98037
Located in the JCPenney's wing
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Southcenter Mall Kiosk

633 Southcenter
Seattle, WA 98188
Located in front of JCPenney
M-F 10am-9pm, Sat 10am-9pm
Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

South Hill Mall Kiosk

3500 S. Meridian
Puyallup, WA 98373
Located in front of the Food Court
Mon-Sat 10am-9pm, Sun 10am-6pm
No equipment exchanges

Technical Help 1-888-COMCAST
Customer Service 1-800-COMCAST
www.comcast.com

Payment Address:

Comcast
P.O. Box 34744
Seattle, WA 98124

The Comcast Customer Guarantee:

The guarantee is an unprecedented public commitment to our customers and includes the following elements:

- We will give you a 30-day, money-back guarantee on all our services.
- We will be respectful and courteous of you and your home.
- We will answer your questions at your convenience.
- We will offer easy-to-understand packages and provide you with a clear bill.
- We will continually offer the best and most video choices.
- We will quickly address any problem you experience.
- We will schedule appointments at your convenience and be mindful of your time.

Federal Way Cable Store

1414 S. 324th Street
Federal Way, WA 98003
M-F 9am-6pm, Sat 9am-5pm

Redmond Cable Store

14870 NE 95th Street
Redmond, WA 98052
M-Sat 9am-7pm

Tacoma Cable Store

5401 6th Avenue, Suite 505
Tacoma, WA 98409
M-Sat 9am-6pm

Northgate Mall Kiosk

401 Northeast Northgate Way
Seattle, WA 98125
Located in front of JCPenney
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Tacoma Mall Kiosk

4502 S Steele St. Ste. 1177
Tacoma, WA 98049
Located in front of Macys
Mon-Sat 10am-9pm, Sun 11am-7pm
No equipment exchanges

Tear here for your
Spring 2010
Channel Lineup.





Comcast Locations:

Auburn Cable Store

4020 Auburn Way North
Auburn, WA 98002
M-F 9am-6pm, Sat 9am-5pm

Lynnwood Cable Store

15815 25th Avenue West
Lynnwood, WA 98087
M-Sat 9am-7pm

Seattle Cable Store

1140 N. 94th Street
Seattle, WA 98103
M-F 9am-7pm, Sat 9am-5pm

Alderwood Mall Kiosk

3000 184th Street Southwest
Lynnwood, WA 98037
Located in the JCPenney's wing
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Southcenter Mall Kiosk

633 Southcenter
Seattle, WA 98188
Located in front of JCPenney
M-F 10am-9pm, Sat 10am-9pm
Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

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3500 S. Meridian
Puyallup, WA 98373
Located in front of the Food Court
Mon-Sat 10am-9pm, Sun 10am-6pm
No equipment exchanges

Technical Help1-888-COMCAST

Customer Service1-800-COMCAST

www.comcast.com

Payment Address:

Comcast
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Seattle, WA 98124

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The guarantee is an unprecedented public commitment to our customers and includes the following elements:

- We will give you a 30-day, money-back guarantee on all our services.
- We will be respectful and courteous of you and your home.
- We will answer your questions at your convenience.
- We will offer easy-to-understand packages and provide you with a clear bill.
- We will continually offer the best and most video choices.
- We will quickly address any problem you experience.
- We will schedule appointments at your convenience and be mindful of your time.

Federal Way Cable Store

1414 S. 324th Street
Federal Way, WA 98003
M-F 9am-6pm, Sat 9am-5pm

Redmond Cable Store

14870 NE 95th Street
Redmond, WA 98052
M-Sat 9am-7pm

Tacoma Cable Store

5401 6th Avenue, Suite 505
Tacoma, WA 98409
M-F 9am-6pm

Northgate Mall Kiosk

401 Northeast Northgate Way
Seattle, WA 98125
Located in front of JCPenney
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Tacoma Mall Kiosk

4502 S Steele St. Ste. 1177
Tacoma, WA 98049
Located in front of Macys
Mon-Sat 10am-9pm, Sun 11am-7pm
No equipment exchanges



- NWCN
- ION TELEVISION
- KOMO (ABC)
- KING (NBC)
- KONG
- KIRO (CBS)
- DISCOVERY CHANNEL
- KCTS (PBS)
- KMYQ (MYNETWORKTV)
- KSTW (CW)
- KBTC (PBS)
- Most Areas
- KVOS
Marysville/Arlington
- KOPQ (FOX)
- KBCB
- KPST *
- QVC
- HSN
- KWDK (DAYSTAR) *
- HALLMARK CHANNEL
- KTBW
- SEATTLE CHANNEL
Seattle
- GOVERNMENT ACCESS
Most Areas
- KING COUNTY CIVIC TV
King County
- GOVERNMENT ACCESS
Most Areas
- TVW
- C-SPAN
- C-SPAN2 *
- EDUCATIONAL ACCESS
Most Areas
- UWTV
- EDUCATIONAL ACCESS
- KUNS (UNIVISION)
- KCTS PLUS
Most Areas
- GOVERNMENT ACCESS
Kirkland
- UW2TV
- LOCAL ORIGINATION
Pierce County
- PUBLIC ACCESS
King County
- LOCAL ORIGINATION
Snohomish County & Vashon Island
- THE WEATHER CHANNEL
- LEASED ACCESS *
- AZTECA AMERICA *
- AAT TV *
- BIZ TELEVISION *
- JEWELRY TV *
- CBUT
- KOMO (ABC)
- KING (NBC)
- KONG
- KIRO (CBS)
- KCTS (PBS)
- KMYQ (MYNETWORKTV)
- KSTW (CW)
- KCTS CREATE *
- KCPQ (FOX)
- KOMO THIS SEATTLE *
- UNIVERSAL SPORTS *
- KCPQ ACCUWEATHER *
- KIRO RETRO TELEVISION
NETWORK *
- KCTS V-ME *
- CBUT
- 964-986 DIGITAL FM RADIO STATIONS *

*Digital channels available with Limited Cable Service and may require a separate Set-Top Receiver and Remote, available for an additional charge.

Also includes Limited Cable channels.

- FOOD NETWORK
- HISTORY



- DISNEY CHANNEL
- CARTOON NETWORK
- ANIMAL PLANET
- CNN
- FOX NEWS CHANNEL
- TRUTV
- LIFETIME
- A&E
- BET
- SPIKE TV
- USA NETWORK
- COMEDY CENTRAL
- E! ENTERTAINMENT
- AMC
- TV GUIDE NETWORK
- 901-946 DIGITAL MUSIC CHANNELS

Also includes Limited and Digital Economy channels.

- ON DEMAND
- FSN NORTHWEST
- ESPN
- ESPN2
- SPEED
- VERSUS
- TRAVEL CHANNEL
- TLC
- ABC FAMILY
- NICKELODEON EAST
- HEADLINE NEWS
- CNBC
- MSNBC
- OXYGEN
- FX
- TNT
- TBS
- SYFY
- CMT
- VH1
- MTV
- MTV2
- BRAVO
- HGTV
- GOLF CHANNEL
- PBS KIDS SPROUT
- BLOOMBERG TELEVISION
- G4
- C-SPAN3
- STYLE
- BIO
- HISTORY INTERNATIONAL
- HALLMARK MOVIE CHANNEL
- LMN
- SPEED
- ESPN
- ESPN2
- GOLF
- VERSUS
- FSN
- STYLE
- E!
- BRAVO
- LIFETIME
- TRAVEL CHANNEL
- FOX NEWS CHANNEL
- CNN
- CNBC
- SPIKE
- UNIVERSAL
- MSNBC
- TNT IN HD
- HD THEATER
- TBS
- FX
- ANIMAL PLANET
- DISCOVERY CHANNEL
- TLC
- A&E
- HISTORY
- USA
- HGTV
- FOOD NETWORK
- SYFY
- DISNEY CHANNEL
- ABC FAMILY
- NICK
- CARTOON NETWORK
- PALLADIA

- KOMO
- KING
- KONG
- KIRO
- KCTS
- KMYQ
- KSTW
- KCPQ
- NFL NETWORK
- NBA LEAGUE PASS
- 455-456 NHL CENTER ICE/MLB
EXTRA INNINGS
- ENCORE
- STARZ KIDS & FAMILY
- STARZ COMEDY
- STARZ
- STARZ EDGE
- HBO2
- HBO SIGNATURE
- HBO FAMILY
- HBO LATINO
- HBO COMEDY
- HBO ZONE
- HBO
- CINEMAX
- MOREMAX
- SHOWTIME TOO
- SHOWTIME SHOWCASE
- SHOWTIME EXTREME
- SHOWTIME
- TMC
- TMC XTRA
- CBUT
- SPEED
- ESPNU
- ESPNEWS
- ESPN
- ESPN2
- GOLF
- VERSUS
- FSN
- MLB NETWORK
- NBA TV
- NHL NETWORK
- BIG TEN NETWORK
- CBS COLLEGE SPORTS
- TENNIS CHANNEL
- OUTDOOR CHANNEL
- NFL REDZONE
- WE TV
- STYLE
- E!
- BRAVO

- LIFETIME
- TRAVEL CHANNEL
- FOX NEWS CHANNEL
- FOX BUSINESS
- CNN
- CNBC
- SPIKE
- UNIVERSAL
- MSNBC
- TNT IN HD
- HD THEATER
- TBS
- FX
- ANIMAL PLANET
- DISCOVERY CHANNEL
- TLC
- A&E
- HISTORY
- USA
- NATIONAL GEOGRAPHIC
CHANNEL
- HGTV
- FOOD NETWORK
- SYFY
- DISNEY CHANNEL
- ABC FAMILY
- NICK
- CARTOON NETWORK
- DISNEY XD
- PALLADIA
- CMT
- VH1
- MTV
- BET
- FUSE
- TV ONE
- QVC
- G4
- BIO
- PLANET GREEN
- SCIENCE CHANNEL
- AMC
- LMN
- IFC
- MGM
- TCM
- HALLMARK MOVIE
CHANNEL
- COMEDY CENTRAL
- TRU TV
- THE WEATHER CHANNEL
- INDEMAND PPV EVENTS



Comcast Locations:

Auburn Cable Store

4020 Auburn Way North
Auburn, WA 98002
M-F 9am-6pm, Sat 9am-5pm

Lynnwood Cable Store

15815 25th Avenue West
Lynnwood, WA 98087
M-Sat 9am-7pm

Seattle Cable Store

1140 N. 94th Street
Seattle, WA 98103
M-F 9am-7pm, Sat 9am-5pm

Alderwood Mall Kiosk

3000 184th Street Southwest
Lynnwood, WA 98037
Located in the JCPenney's wing
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Southcenter Mall Kiosk

633 Southcenter
Seattle, WA 98188
Located in front of JCPenney
M-F 10am-9pm, Sat 10am-9pm
Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

South Hill Mall Kiosk

3500 S. Meridian
Puyallup, WA 98373
Located in front of the Food Court
Mon-Sat 10am-9pm, Sun 10am-6pm
No equipment exchanges

Technical Help 1-888-COMCAST

Customer Service 1-800-COMCAST

www.comcast.com

Payment Address:

Comcast
P.O. Box 34744
Seattle, WA 98124

The Comcast Customer Guarantee:

The guarantee is an unprecedented public commitment to our customers and includes the following elements:

- We will give you a 30-day, money-back guarantee on all our services.
- We will be respectful and courteous of you and your home.
- We will answer your questions at your convenience.
- We will offer easy-to-understand packages and provide you with a clear bill.
- We will continually offer the best and most video choices.
- We will quickly address any problem you experience.
- We will schedule appointments at your convenience and be mindful of your time.

Federal Way Cable Store

1414 S. 324th Street
Federal Way, WA 98003
M-F 9am-6pm, Sat 9am-5pm

Redmond Cable Store

14870 NE 95th Street
Redmond, WA 98052
M-Sat 9am-7pm

Tacoma Cable Store

5401 6th Avenue, Suite 505
Tacoma, WA 98409
M-Sat 9am-6pm

Northgate Mall Kiosk

401 Northeast Northgate Way
Seattle, WA 98125
Located in front of JCPenney
M-Sat 10am-9:30pm, Sun 11am-7pm
Payments and Equipment
NOT ACCEPTED at this location

Tacoma Mall Kiosk

4502 S Steele St. Ste. 1177
Tacoma, WA 98049
Located in front of Macys
Mon-Sat 10am-9pm, Sun 11am-7pm
No equipment exchanges

- NWCN
- ION TELEVISION
- KOMO (ABC)
- KING (NBC)
- KONG
- KIRO (CBS)
- DISCOVERY CHANNEL
- KCTS (PBS)
- KMYQ (MYNETWORKTV)
- KSTW (CW)
- KBTC (PBS)

Most Areas

13 KCPQ (FOX)

14 KBCB

15 KPST *

16 QVC

17 HSN

18 KWDK (DAYSTAR) *

19 HALLMARK CHANNEL

20 KTBW

21 SEATTLE CHANNEL

22 GOVERNMENT ACCESS

Most Areas

22 KING COUNTY CIVIC TV

King County

22 GOVERNMENT ACCESS

Most Areas

23 TVW

24 C-SPAN

25 C-SPAN2 *

26 EDUCATIONAL ACCESS

Most Areas

27 UWTV

28 EDUCATIONAL ACCESS

29 KUNS (UNIVISION)

75 KCTS PLUS

Most Areas

75 GOVERNMENT ACCESS

Kirkland

76 UW2TV

76 LOCAL ORIGATION

Pierce County

77 PUBLIC ACCESS

King County

77 LOCAL ORIGATION

Snohomish County & Vashon Island

78 THE WEATHER CHANNEL

79 LEASED ACCESS *

91 AZTECA AMERICA *

92 AAT TV *

93 BIZ TELEVISION *

96 JEWELRY TV *

99 CBUT

104 KOMO (ABC)

105 KING (NBC)

106 KONG

107 KIRO (CBS)

109 KCTS (PBS)

110 KMYQ (MYNETWORKTV)

111 KSTW (CW)

112 KCTS CREATE *

113 KCPQ (FOX)

114 KOMO THIS SEATTLE *

115 UNIVERSAL SPORTS *

116 KCPQ ACCUWEATHER *

117 KIRO RETRO TELEVISION

NETWORK *

119 KCTS V-ME *

619 CBUT ^{HD}

964-986 DIGITAL FM RADIO STATIONS *

*Digital channels available with Limited Cable Service and may require a separate Set-Top Receiver and Remote, available for an additional charge.

Also includes Limited Cable channels.

35 FOOD NETWORK

37 HISTORY

- DISNEY CHANNEL
- CARTOON NETWORK
- ANIMAL PLANET
- CNN
- FOX NEWS CHANNEL
- TRUTV
- LIFETIME
- A&E
- BET
- SPIKE TV
- USA NETWORK
- COMEDY CENTRAL
- E! ENTERTAINMENT
- AMC
- TV GUIDE NETWORK
- 901-946 DIGITAL MUSIC CHANNELS

Also includes Limited and Digital Economy channels.

1 ON DEMAND

30 FSN NORTHWEST

31 ESPN

32 ESPN2

33 SPEED

34 VERSUS

36 TRAVEL CHANNEL

38 TLC

39 ABC FAMILY

40 NICKELODEON EAST

45 HEADLINE NEWS

46 CNBC

47 MSNBC

50 OXYGEN

53 FX

54 TNT

55 TBS

59 SYFY

61 CMT

62 VH1

63 MTV

64 MTV2

66 BRAVO

68 HGTV

70 GOLF CHANNEL

118 PBS KIDS SPROUT

128 BLOOMBERG TELEVISION

136 G4

150 C-SPAN3

183 STYLE

275 BIC

276 HISTORY INTERNATIONAL

500 HALLMARK MOVIE CHANNEL

504 LMN

620 SPEED

623 ESPN

624 ESPN2

625 GOLF

626 VERSUS

627 FSN

650 STYLE

651 E!

652 BRAVO

653 LIFETIME

654 TRAVEL CHANNEL

655 FOX NEWS CHANNEL

657 CNN

658 CNBC

659 SPIKE

660 UNIVERSAL

661 MSNBC

662 TNT IN HD

663 HD THEATER

664 TBS

665 FX

667 ANIMAL PLANET

668 DISCOVERY CHANNEL

669 TLC

670 A&E

671 HISTORY

672 USA

674 HGTV

675 FOOD NETWORK

676 SYFY

677 DISNEY CHANNEL

678 ABC FAMILY

679 NICK

680 CARTOON NETWORK

685 PALLADIA

- CMT
- FOX BUSINESS
- MTV
- BET
- QVC
- G4
- BIO
- AMC
- LMN
- HALLMARK MOVIE CHANNEL
- COMEDY CENTRAL
- TRU TV
- THE WEATHER CHANNEL
- COMCAST CENTRAL

Also includes Limited, Digital Economy and Digital Starter channels.

101 WEATHERSCAN LOCAL

120 NICK JR

121 DISCOVERY KIDS

122 DISNEY XD

125 CURRENT TV

126 NICKTOONS

127 NICKELODEON WEST

130 FOX BUSINESS

139 LOGO

149 MOVIEPLEX

158 SOAPNET

159 FOX REALITY CHANNEL

161 GSN

162 BBC AMERICA

163 TV LAND

179 COMCAST SPORTSNET

201 PLANET GREEN

203 DIY NETWORK

204 FINE LIVING

205 RETIREMENT LIVING TV

215 TEENNICK

220 DISCOVERY HEALTH

222 FIT TV

231 HALOGEN

232 BYUTV

233 EWTN

271 INVESTIGATION DISCOVERY

272 SCIENCE CHANNEL

273 NATIONAL GEOGRAPHIC CHANNEL

274 MILITARY CHANNEL

400 ESPNU

401 FOX SOCCER CHANNEL

402 ESPNEWS

406 OUTDOOR CHANNEL

407 MLB NETWORK

409 TVG

416 NBA TV

417 NFL NETWORK

418 NFL NETWORK ^{HD}

419 NHL NETWORK

471 CMT PURE COUNTRY

472 MTV HITS

473 VH1 CLASSIC

474 VH1 SOUL

475 MTV JAMS

476 FUSE

482 GOSPEL MUSIC CHANNEL

483 TV ONE

484 GAC

486 THE WORD NETWORK

501 TCM

502 WE TV

503 IFC

505 SUNDANCE CHANNEL

513 INDIEPLEX

514 RETROPLEX

516 ENCORE WAM

517 ENCORE ^{HD}

518 ENCORE

519 ENCORE LOVE

521 ENCORE MYSTERY

523 ENCORE WESTERNS

527 ENCORE DRAMA

529 ENCORE ACTION

586 FLIX

621 ESPNU

622 ESPNEWS

629 MLB NETWORK

630 NBA TV

631 NHL NETWORK

635 OUTDOOR CHANNEL

- WE TV
- FOX BUSINESS
- NATIONAL GEOGRAPHIC CHANNEL
- DISNEY XD
- PALLADIA
- FUSE
- TV ONE
- PLANET GREEN
- SCIENCE CHANNEL
- IFC
- MGM
- TCM
- TELEMUNDO
- MUN2
- MTV TR3S

401 FOX SOCCER CHANNEL

402 ESPNEWS

403 ESPN CLASSIC

404 BIG TEN NETWORK

406 OUTDOOR CHANNEL

407 MLB NETWORK

409 TVG

410 NFL REDZONE

411 TENNIS CHANNEL

412 CBS COLLEGE SPORTS NETWORK

413 FOX COLLEGE SPORTS - ATL

414 FOX COLLEGE SPORTS - CEN

415 FOX COLLEGE SPORTS - PAC

416 NBA TV

417 NFL NETWORK

418 NFL NETWORK

419 NHL NETWORK

481 CENTRIC

506 FOX MOVIE CHANNEL

622 ESPNEWS

629 MLB NETWORK

630 NBA TV

631 NHL NETWORK

632 BIG TEN NETWORK

633 CBS COLLEGE SPORTS

634 TENNIS CHANNEL

635 OUTDOOR CHANNEL

637 NFL REDZONE ^{HD}

STARZ

530 STARZ KIDS & FAMILY ^{HD}

531 STARZ COMEDY ^{HD}

532 STARZ ^{HD}

533 STARZ EDGE ^{HD}

534 STARZ

536 STARZ EDGE

53

Contact your local Comcast Representative:

Nasdaq: CMCSA

Digital TV: Certain services are available separately or as a part of other levels of service. Limited Cable subscription required to receive other levels of service. On Demand requires subscription to a qualifying Digital TV package and On Demand and Pay-Per-View selections subject to charge indicated at the time of purchase. Converter and remote may be required to receive certain services. HD choices include HD channel lineup and HD programming available from Comcast On Demand. Choices and availability may vary by area. DVR service may require a deposit. DVR service requires an additional monthly DVR service fee. Number of recording hours varies by model. Please call your local Comcast office for restrictions and complete details about service, prices and equipment.

Internet: Speeds stated are for download and upload. Many factors affect speed. Actual speeds vary and are not guaranteed. PowerBoost® as included with High-Speed Internet plan provides a burst of additional download and upload speed for the first 10 MB and 5 MB of a file, respectively. Not all features are compatible with Macintosh Systems. Professional installation (for an additional fee) required for non-Comcast cable video customers, and rates vary according to service area. Self-Install Kit, requires customer installation, may only be used for existing cable wired outlets, and is not available in all areas. Shipping, handling and other charges may apply.

Digital Voice: \$29.95 activation fee may apply. Unlimited Local and Long Distance package pricing applies only to direct Dialed calls from home to locations in the U.S., Canada, Puerto Rico and certain other U.S. territories. Comcast Unlimited and Local with More do not include other international calls. For more information regarding Comcast Digital Voice pricing, go to: <http://www.comcast.com/corporate/about/phonetermssofservice> for country-specific rates. Service (included 911/emergency services) may not function after an extended power outage. No separate long distance carrier connection available. Certain customer premises equipment may not be compatible with Digital Voice services. EMTA required (\$5.00/month from Comcast). Pricing and services subject to change. Additional charges apply for calls beyond coverage area. Separate long distance carrier connections and dial around calling not available. Carefree Minutes™ flat monthly plan pricing applies only to direct-dialed calls made from home to locations included with plan and does not include calls to mobile numbers, operator services and directory assistance. Separate long distance carrier connections and dial around calling are not available. Unused minutes do not roll over to the following month. For plan coverage areas and restrictions, call 1-800-266-2278. Please consult the Pricing Lists at www.comcast.com/internationalcalling for more information. Carefree Minutes plans require subscription to Comcast Digital Voice service for an additional fee. SmartZone® Communications Center requires subscription to Comcast High-Speed Internet. Transfers of existing telephone number not always available.

All Services: Not all services are available in all areas. Equipment, installation, taxes, franchise fees, the Regulatory Recovery Fee and other applicable charges (e.g., Pay-Per-View, per-call, toll and international calling) are extra. Please call your local Comcast office for restrictions and complete details about service, prices and equipment. © 2010 Comcast. All rights reserved.

King, Pierce & Snohomish

Tear Here

Attachment 2

Services & Prices

Prices apply to residential accounts only.



North Metro

	Current Price	Effective Jan. 2010
Basic Cable	Monthly	Monthly
Basic Cable.....	\$ 9.57	\$ 10.23
Basic 2 Cable (requires Basic Cable).....	\$ 47.93	\$ 49.22
Standard Cable (includes Basic and Basic 2 Cable).....	\$ 57.50	\$ 59.45

	Monthly	Monthly
Digital Packages		
Digital Economy Package—Stand-alone (includes Basic Cable, digital receiver, remote and Digital Economy Channels) (12/22/09).....	\$ 39.95	No Change
Digital Economy Package—with multi-product subscription (includes Basic Cable, digital receiver, remote and Digital Economy Channels) (12/22/09).....	\$ 29.95	No Change
Digital Starter Package (includes Standard Cable, digital receiver and remote).....	\$ 57.50	\$ 59.45
Digital Preferred Package* (no premium channels).....	\$ 74.49	\$ 76.44
Digital Preferred Plus Package* (includes HBO & Starz).....	\$ 101.50	\$ 103.45
Digital Premier Package* (includes HBO, Starz, Showtime, Cinemax and the Sports Entertainment Package).....	\$ 115.50	\$ 117.45

	Monthly	Monthly
Digital Services (a la carte)		
Digital Classic (requires subscription to Digital Starter Package).....	\$ 16.99	No Change
Family Tier (requires subscription to Basic Cable and cannot be combined with service levels that include or require Basic 2 Cable or Standard Cable).....	\$ 14.99	No Change
Sports Entertainment Package**.....	\$ 6.99	No Change
Digital Latino**.....	\$ 6.99	No Change
Digital Video Recorder Service (DVR) (requires subscription to Digital Starter).....	\$ 15.95	No Change
Digital Additional Outlet Service.....	\$ 6.95	\$ 7.45
Digital Starter Additional Outlet Service.....	\$ 1.99	\$ 2.49
Digital to Analog Additional Outlet Service (1st and 2nd outlets) (each).....	—	\$ 0.00
Digital to Analog Additional Outlet Service (3rd and 4th outlets) (each).....	—	\$ 1.99
HD Technology Fee (with qualifying digital package).....	—	\$ 7.00

	Monthly	Monthly
3-Product Bundles		
Value Plus Triple Play (includes Digital Starter Video Service with digital receiver and remote, High-Speed Internet Performance Service and Comcast Digital Voice Local with More).....	\$ 114.95	No Change
HD Starter (includes Digital Starter Video Service with HD, 1 HD receiver and remote, High-Speed Internet Performance Service and Comcast Digital Voice Unlimited).....	\$ 129.99	No Change
HD Preferred (includes Digital Preferred Video Service with HD, 1 HD receiver and remote, High-Speed Internet Performance Service and Comcast Digital Voice Unlimited).....	\$ 144.94	No Change
HD Plus (includes Digital Preferred Video Service with HD, HBO, 1 HD receiver and remote, High-Speed Internet Blast! Service and Comcast Digital Voice Unlimited).....	\$ 159.99	No Change
HD Preferred Plus (includes Digital Preferred Video Service with HD, HBO, Starz, 1 HD receiver and remote, High-Speed Internet Blast! Service and Comcast Digital Voice Unlimited).....	\$ 169.99	No Change
HD Premier (includes Premier Video Service with HD, HBO, Starz, Cinemax, Showtime and the Sports Entertainment Package, 1 HD DVR receiver and remote, High-Speed Internet Ultra Service and Comcast Digital Voice Unlimited).....	\$ 199.99	No Change

	Monthly	Monthly
Premium/Subscription Services (a la carte)**		
HBO, Starz, Showtime, Cinemax, The Movie Channel (each).....	\$ 16.99	No Change
Playboy Subscription.....	\$ 19.99	No Change
Bollywood (available via ON DEMAND only).....	\$ 12.99	No Change
here! TV (available via ON DEMAND only).....	\$ 7.99	No Change
Howard Stern TV (available via ON DEMAND only) (can also be purchased at a \$7.99 per show basis or a \$119.99 yearly rate).....	\$ 10.99	No Change
Too Much For TV (available via ON DEMAND only).....	\$ 14.99	No Change
Disney Family Movies (available via ON DEMAND only).....	\$ 5.99	No Change
WWE Classics (available via ON DEMAND only).....	\$ 7.99	No Change

*Digital Preferred and Digital Premier Packages include Digital Starter, Digital Classic and any applicable movie channels and does not include adult channels or ON DEMAND subscription services.

**Basic Cable and a digital receiver are required to receive these services. Digital Service is not required.

***Digital Starter Package required.

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Comcast ON DEMAND***

Comcast ON DEMAND Movies, Specials, Events, HD Movies & Adult Movies are individually priced..... Price Varies Price Varies

	Monthly	Monthly
Equipment		
Digital Receiver.....	\$ 1.69	No Change
Remote Control.....	\$ 0.10	No Change
Basic Only Receiver.....	\$ 1.00	No Change
High-Definition (HD) Receiver.....	\$ 7.00	No Change
CableCARD (first card and additional card in same device).....	\$ 0.00	No Change

Comcast High-Speed Internet

	Monthly	Monthly
Extreme 50 (50Mbps/10Mbps) (with cable or CDV).....	\$ 99.95	No Change
Extreme 50 (50Mbps/10Mbps) (without cable or CDV).....	\$ 116.95	\$ 114.95
Ultra (22Mbps/5Mbps) (with cable or CDV).....	\$ 62.95	No Change
Ultra (22Mbps/5Mbps) (without cable or CDV).....	\$ 79.95	\$ 77.95
Blast! (16Mbps/2Mbps) (with cable or CDV).....	\$ 52.95	No Change
Blast! (16Mbps/2Mbps) (without cable or CDV).....	\$ 69.95	\$ 67.95
Performance (12Mbps/2Mbps) (with cable or CDV).....	\$ 42.95	No Change
Performance (12Mbps/2Mbps) (without cable or CDV).....	\$ 59.95	\$ 57.95
Economy (1Mbps/384kbps) (with cable or CDV).....	\$ 24.95	No Change
Economy (1Mbps/384kbps) (without cable or CDV).....	\$ 39.95	No Change
High-Speed Internet Modem Lease.....	\$ 3.00	\$ 5.00
1 Additional IP Address.....	\$ 4.95	No Change
Additional IP Addresses (per IP address up to 3 additional addresses).....	\$ 9.00	No Change
Home Networking Wireless G Router.....	\$ 2.00	\$ 0.00
Home Networking Wireless N Router.....	\$ 5.00	\$ 0.00
Ethernet Device (each/transaction).....	\$ 20.00	No Change
Wireless Card Adapter (802.11b) (each/transaction).....	\$ 30.00	No Change
Mac Compatible Card or Adapter (each/transaction).....	\$ 79.99	No Change

Comcast Digital Voice® (CDV)

	Monthly	Monthly
Digital Voice Unlimited Package (with cable AND high-speed Internet)††.....	\$ 39.95	No Change
Digital Voice Unlimited Package (without cable AND high-speed Internet)††.....	\$ 44.95	No Change
Digital Voice Local with More™ (with cable or high-speed Internet)†††.....	\$ 24.95	No Change
Digital Voice Local with More (without cable or high-speed Internet)†††.....	\$ 34.95	No Change
Digital Voice Local with More Voice Mail.....	\$ 3.95	No Change
Digital Voice Modem Lease (EMTA).....	\$ 3.50	\$ 5.00
Digital Voice Modem Lease (4 line EMTA).....	\$ 5.50	No Change
Additional Line—Premium (with features).....	\$ 20.00	No Change
Additional Line—Basic (without features).....	\$ 10.00	No Change
Carefree Minutes (Western Europe 100, Asia 100 and Mexico 100)††††.....	\$ 4.95	No Change
Carefree Minutes (Latin America 100)††††.....	\$ 9.95	No Change
Carefree Minutes (Worldwide 300)††††.....	\$ 14.95	No Change

(continued on back page)

†Modem lease fee is not included.

††Unlimited — Includes unlimited nationwide direct-dial calling from your home including calls to Puerto Rico, US Virgin Islands, Guam, Saipan/N. Mariana Islands, Canada, and American Samoa. The following calling features are also included: 3-way Calling, Anonymous Call Rejection, Call Forwarding Selective, Call Forwarding Variable, Call Return, Call Screening, Call Waiting, Caller ID, Caller ID Per-Call or Per-Line Blocking, Caller ID with Call Waiting, Repeat Dialing, Speed Dial B, Enhanced Voice Mail and other enhanced features. Prices shown are for the Voice component only.

†††LWM — Includes unlimited direct-dialed local calling from your home. (For information regarding your Local Calling Area, call 1-800-COMCAST.) The following calling features are also included: 3-way Calling, Anonymous Call Rejection, Call Forwarding Selective, Call Forwarding Variable, Call Return, Call Screening, Call Waiting, Caller ID, Caller ID Per-Call or Per-Line Blocking, Caller ID with Call Waiting, Repeat Dialing, Speed Dial B and other enhanced features. Prices shown are for the Voice component only. Usage charges apply for calls to (and calls forwarded to) non-local terminating numbers.

††††Carefree Minutes Plans (Rates \$4.95-\$14.95) does not include calls to mobile numbers, operator services and directory assistance. Unused minutes do not roll over to the following month.

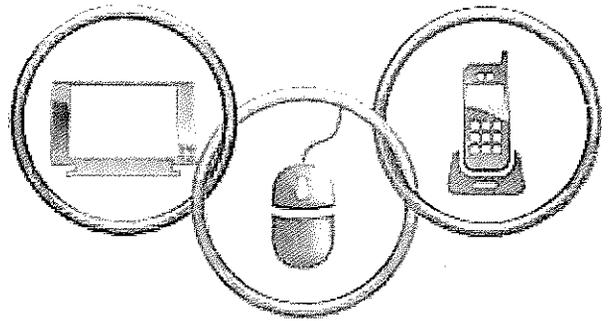
Services & Prices

Installation/Service Charges

Hourly Service Charge	\$ 32.99	No Change
Install—Unwired Home (aerial/underground within 125 feet)	\$ 44.99	No Change
Install—Prewired Home (aerial/underground within 125 feet)	\$ 29.99	No Change
Install Additional Outlet (with initial installation activity)	\$ 15.99	No Change
Install Additional Outlet (separate installation activity)	\$ 25.99	No Change
Other Install—Relocate Outlet	\$ 20.99	No Change
Other Install—Upgrade (home visit required)	\$ 15.99	No Change
Other Install—Downgrade (home visit required)	\$ 10.49	No Change
Other Install—Automated Change (no home visit required)	\$ 1.99	No Change
Connect VCR (with initial installation activity)	\$ 6.99	No Change
Connect VCR (separate installation activity)	\$ 12.99	No Change
Service Call Charge (w/o subscription to In Home Wire Maintenance Plan)	\$ 27.99	No Change
Wall Fish	\$ 25.00	No Change
Install Comcast High-Speed Internet—Premium	\$ 49.95	No Change
Standard Comcast Digital Voice Installation	\$ 99.00	No Change
Self-Install Kit	\$ 29.95	No Change
Self-Install Kit—Shipping and Handling	\$ 9.95	No Change
Home Networking Installation—up to 5 PCs	\$149.95	No Change
Data Outlet Installation	\$ 13.99	No Change
Modem Activation Fee (per service)	\$ 4.00	No Change
CDV Service Activation/Reconnection Charge	\$ 29.95	No Change
CDV In-Home Repair	\$ 26.99	No Change
Video Receiver Reactivation	\$ 1.99	No Change
High-Speed Internet Modem Reactivation	\$ 4.00	No Change
Comcast Digital Voice Modem Reactivation	\$ 4.00	No Change

Other Fees/Charges

In Home Wire Maintenance Plan (monthly)	\$ 1.99	No Change
Channel Guide Magazine (monthly)	\$ 3.95	No Change
PEG Fee (Public, Educational & Government Programming) (monthly)	\$ 2.90	\$ 3.01
Payment Convenience Fee/Speed Pay Fee	\$ 5.00	No Change
Late Fee	\$ 7.00	No Change
Returned Check Fee	\$ 30.00	No Change
Field Collection	\$ 25.00	No Change
Unreturned or Damaged Equipment	Price Varies	Price Varies



Effective with your January 2010 billing statement, the amount of franchise fees passed through and reflected on customer's bills per FCC regulations will be adjusted to reflect actual franchise fee payments for the previous year. The franchise fee Comcast is obligated to pay Local Franchising Authorities may change. Prices exclude applicable franchise fees, regulatory fees, taxes and other franchise related fees. Comcast service is subject to the terms and conditions of Comcast Cable Policies and Practices. Pricing, programming, channel location and packaging is subject to change. All rates apply to standard installations and/or monthly services on residential accounts only, and do not include fees and taxes. Non-standard installations are based on the hourly service charge times actual time spent on the activity. You must subscribe to Basic Cable to receive other levels of service excluding High-Speed Internet and/or CDV Service. For some services a receiver and remote is required at an additional charge. A modem is required for High-Speed Internet and/or CDV service. Rates may vary by area and are subject to change. Commercial fees vary. Services subject to availability. Other restrictions may apply.

Serving the cities of: Blaine, Centerville,
Circle Pines, Ham Lake, Lexington,
Lino Lakes and Spring Lake Park.



651-222-3333

North Metro 1/10



Effective January 1, 2010

North Metro

Attachment 3

XFINITY TV

TUALATIN VALLEY

VIDEO RATES

MONTHLY SERVICE CHARGES	
LIMITED BASIC SERVICE	
Tualatin Valley	\$9.99
MONTHLY DIGITAL PACKAGE PRICING	
Digital Starter	\$59.95
Includes Limited Basic, Digital Starter, Digital Music Choice, Interactive Program Guide, access to On Demand, 1 Digital Converter & 2 Digital Adapters	
Digital Preferred	\$76.90
Includes everything in Digital Starter plus the Digital Preferred channels	
Digital Preferred Plus	\$107.95
Includes everything in Digital Preferred package plus HBO & Starz Premium Services including multiplexes and On Demand content	
Digital Premier	\$127.95
Includes everything in Digital Preferred Plus package plus Sports Entertainment Tier, Cinemax & Showtime Premium Services including multiplexes and On Demand content	
Digital Economy (with Internet or Voice)	\$29.95
(without Internet or Voice)	\$39.95
Includes Limited Basic, 19 select Digital Starter Channels, Interactive Program Guide, Digital Music Choice Channels, 1 Digital Converter & remote	
Digital Family Tier	\$14.95
Includes 14 family friendly channels such as Hallmark, Disney & Sprout. Requires subscription to Limited Basic, Digital Converter & remote	
Sports Entertainment Tier	\$5.99
MONTHLY PREMIUM SERVICES	
Cinemax (Multiplex channels and On Demand Content)	\$15.99
HBO (Multiplex channels and On Demand Content)	\$15.99
Showtime (Multiplex channels and On Demand Content)	\$15.99
Starz (Multiplex channels and On Demand Content)	\$15.99
TMC (Multiplex channels and On Demand Content)	\$15.99
C1R (Russian)	\$14.99
GMA Pinoy TV (Filipino)	\$11.99
RTN (Russian)	\$14.99
SBTN (Vietnamese)	\$14.99
TV5 Monde (French)	\$9.99
TFC (Filipino)	\$14.99
TV Japan (Japanese)	\$24.99
Filipino Pak (Includes TFC & GMA Pinoy TV)	\$19.99
Russian Pak (Includes C1R & RTN)	\$21.99
MONTHLY SUBSCRIPTION ON DEMAND	
Disney Family Movies	\$5.99
Filipino (a la carte)	\$7.99
Filipino (w/TFC)	\$5.99
Bollywood Hits	\$12.99
WWE Classics	\$7.99
Here TV	\$7.99
Too Much for TV	\$14.99
Howard Stern	\$10.99
Howard Stern (annually)	\$119.99
MONTHLY ADULT PREMIUM SERVICES	
Playboy TV (includes On Demand content)	\$19.99

SPANISH LANGUAGE SERVICES

Selecto Total	\$19.95
CableLatino	\$29.95
Includes Limited Basic, Selecto Total, Music Choice Channels, access to On Demand and Digital PPV, TV Guide Interactive and one (1) Digital Converter & remote	
CableLatino Completo	\$64.95
Includes everything in CableLatino plus Digital Starter channels and two (2) Digital Adapters. Add HBO and all of its multiplexes to CableLatino Completo for an additional \$10/month	

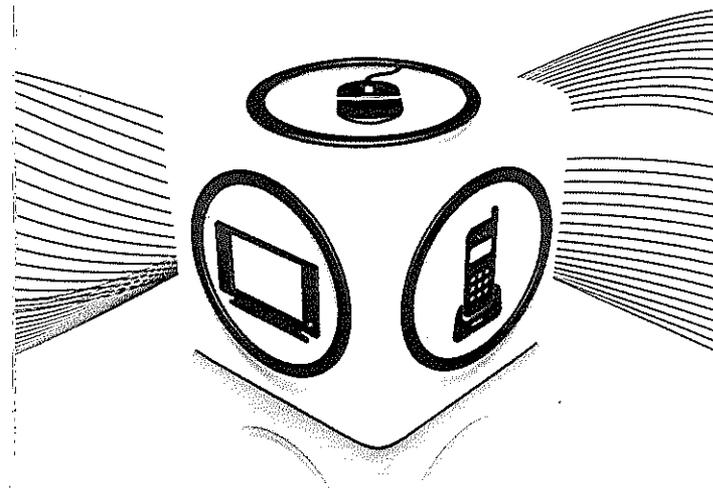
OTHER SERVICES

MONTHLY DIGITAL CHARGES	
HD Technology Fee (w/qualifying Digital Package)	\$6.50
DVR Service (HD)	\$15.95
DVR Service (SD)	\$8.95
Digital Additional Outlets	
w/ one digital converter	\$7.49
w/ 2 or 3 digital converters	\$9.99
each additional outlet w/ digital converter (after 3)	\$3.33
Digital Adapter	
1st & 2nd Outlet	\$0.00
each additional outlet w/ Digital Adapter (after 2)	\$1.99
MONTHLY EQUIPMENT RENTAL	
Limited Basic Only Converter	\$1.00
Digital Converter	\$3.20
HD Converter	\$6.00
Remote Control	\$0.20
1st CableCARD	\$0.00
Additional CableCARD	\$1.75
INSTALLATION CHARGES AND ONE-TIME FEES	
Unwired Home Installation	\$43.99
Pre-wired Home Installation	\$29.99
Additional Outlet Connection (at time of initial install)	\$16.99
Additional Outlet Connection (requiring separate trip)	\$25.99
Relocate Outlet	\$19.99
Activate Existing Outlet	\$9.99
VCR Connection (at time of initial install)	\$6.99
VCR Connection (requiring separate trip)	\$13.99
Upgrade of Services (requiring separate trip)	\$15.99
Downgrade of Services (requiring separate trip)	\$9.99
Upgrade/Downgrade (addressable services)	\$1.99
Customer Trouble Call	\$28.99
Service Charge (hourly)	\$30.99
Self-Install Kit (optional)	\$14.95
Digital Converter	
Standard Shipping & Handling (additional)	\$9.95
Priority Shipping & Handling (optional)	\$29.95
Remote Control	
Standard Shipping & Handling (additional)	\$5.95
Priority Shipping & Handling (optional)	\$29.95
DVR/HD Kit (Service Center pick-up Only)	\$1.99
Self-Install Failure (follow-up visit)	\$15.99
Video Reactivation Fee	\$1.99

UNRETURNED EQUIPMENT CHARGES
Equal to the Replacement Cost

Channel Lineup & Rates

Tualatin Valley Effective March 31, 2010



xfinity

Introducing XFINITY—
TV, Phone and Internet REINVENTED.

comcast



Comcast Cable
9605 SW Nimbus Avenue
Beaverton, OR 97008

November 11, 2009

Mr. Bruce Crest
Administrator
Metropolitan Area Communications Commission
1815 NW 169th Place, Suite 6020
Beaverton, OR 97006

RE: HD Technology Fee

Dear Mr. Crest:

Please note that some customers in your area received a rate adjustment notification with an incorrect rate for the HD Technology Fee. Our letter to you, dated October 16, 2009, also had the incorrect rate in the attachment.

The Products and Services Price List some customers received stated that the HD Technology Fee is \$8.00; however, the fee is actually \$6.50.

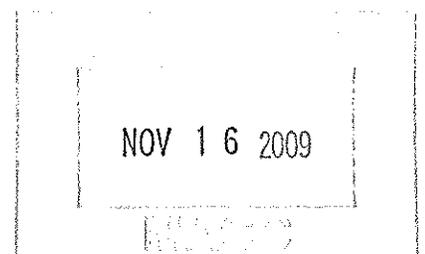
While our communications efforts start with you, we will be reaching out to those Comcast subscribers who received the incorrect fee notice through the following bill message, which will begin on 11/17/09:

Effective with January billing, a new monthly HD Technology Fee of \$6.50 will be effective. While this fee was previously communicated to be \$8.00, it will instead be \$6.50.

As always should you have any questions, please feel free to contact me at (503) 605-6353.

Sincerely,

Andrea Sargeant
Government Affairs Professional





Comcast Cable
9605 SW Nimbus Avenue
Beaverton, OR 97008

October 16, 2009

Mr. Bruce Crest
Administrator
Metropolitan Area Communications Commission
1815 NW 169th Place, Suite 6020
Beaverton, OR 97006

Dear Mr. Crest:

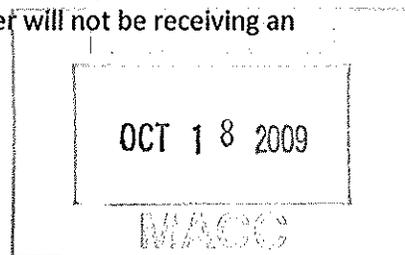
At Comcast, our goal is to continue to provide our customers with great products, service and value. We are proud to offer customers in your area the largest Video On Demand library, the most High-Definition choices, a faster high-speed Internet, and smarter home phone service with unlimited local and nationwide long distance calling.

With the launch of Comcast Digital Voice, Comcast brought consumers in your area the first true alternative to traditional phone service. This competition has already saved consumers across the country \$23.5 billion, including \$13 billion in 2007 alone. We understand the importance of choice and are glad that over 7 million customers have chosen Comcast Digital Voice, making us the third largest residential home phone provider in the U.S.

In addition to bringing our customers choice in phone service, Comcast leads the broadband revolution as America's largest residential broadband provider. Over the past five years we have consistently increased the speed of our Internet service without increasing the cost of the service to our customers. We recently doubled the download speed on our most popular broadband product from 6 Mbps to 12 Mbps, and also offer up to 50 Mbps download speed.

Through innovation and technology Comcast has brought to its customers the fastest residential broadband speeds available from any provider. Our customers also receive additional valuable benefits at no extra charge, including the McAfee Security Suite (a \$120 value), Plaxo (a \$59.95 value), and expanded content on Comcast.net (such as ESPN360.com, even more entertainment, multiple email accounts, shopping and security features). In addition, Comcast has plans to offer customers in your community the option to receive a wireless in-home router at no additional charge. A wireless router is a convenient way for our customers to extend their Comcast High-Speed Internet service throughout the home.

While the cost of our High-Speed Internet and digital voice services are not increasing at this time, effective with January billing, the monthly price for Limited Basic in the Tualatin Valley is increasing by \$2.71 to \$9.99 and in the West Suburban Areas by \$1.55 to \$18.05, and Digital Starter is increasing by \$1.96 to \$59.95. The rates for our other tiers and some equipment will also be adjusted. Please see the attached price and service list for more information. Please know that customers who enjoy a promotional offer will not be receiving an increase in his or her service charges during the promotional period.



The changes to the cost of our cable service are the result of increased business and operational costs. By way of example, Comcast spends about \$6 billion a year on programming alone to provide our customers the best content and the most video choices. While we have been aggressive at controlling these costs, we expect continued increases to the costs we pay for programming.

Despite the increased cost of doing business, Comcast has continued to add value to our services. In the past year, we have:

- Added more sports content including the NFL Network, NBA TV, NHL Network and ESPN U to our Digital Preferred service tier, giving customers access to the top professional and collegiate sports programming.
- Added up to 10 channels increasing the lineup on Digital Starter service with networks such as Bloomberg, LMN, CSPAN 3, Sprout, G4, Hallmark Movie Channel and History International.
- Provided new converged services like Universal Caller ID to the TV and the PC that we deliver across all three platforms (TV, PC, and phone) at no additional charge.
- Continually enhanced the customer experience through better, more integrated products and an improved customer experience at all levels.

Attached is our updated service and price list effective with January billing. As always, should you have any questions, please feel free to contact me at (503) 605-6353.

Sincerely,



Andrea Sargeant
Government Affairs Professional

Effective with January 2010 Billing

Products & Services Price List

(all prices exclude applicable franchise fees, regulatory fees and taxes)

Serving Tualatin Valley

King City, Beaverton, Tigard, Lake Oswego, Mountain Park, Hillsboro, Forest Grove, Washington County, Cornelius, Tualatin, Sherwood, North Plains, Banks, Wilsonville, Aloha, Gaston, Rivergrove, Durham, Clackamas County

Analog Subscribers (monthly fee)		Current Rate	New Rate	Other Fees		Current Rate	New Rate
Limited Basic		\$7.28	\$9.99	Late Payment Fee		\$6.00	\$6.00
				Assisted Payment Fee		\$3.99	\$4.99
				Non-Sufficient Funds Charge		\$35.00	\$35.00
				Video Restart Fee		\$1.99	\$1.99
				Internet Restart Fee		\$3.00	\$4.00
				Voice Restart Fee		\$3.00	\$4.00
Digital Video Packages & Digital Tiers (monthly fee)		Current Rate	New Rate	Discontinued Video Packages / No Longer Sold (monthly fee)			
Digital Starter		\$57.99	\$59.95	Digital Silver		\$89.99	\$92.89
Digital Preferred		\$74.94	\$76.90	Digital Gold		\$105.99	\$107.95
Digital Preferred Plus		\$105.99	\$107.95	Digital Platinum		\$124.99	\$131.99
Digital Premier		\$125.99	\$127.95	Total Premium		\$125.99	\$127.95
				Digital Premium		\$93.99	\$98.99
Digital Economy		\$39.95	\$39.95	Digital Premium Plus		\$106.99	\$112.99
Digital Economy (with Internet or Phone)		\$29.95	\$29.95	Digital Bronze		\$72.99	\$76.90
Family Tier		\$14.95	\$14.95	Digital Standard		\$79.99	\$82.89
Sports Entertainment Tier		\$5.99	\$5.99	Legacy Digital Silver		\$93.99	\$98.99
HD Technology Fee		NA	\$8.00	Legacy Digital Gold		\$107.99	\$113.99
DVR Service (HD)		\$15.95	\$15.95	Legacy Digital Platinum		\$126.99	\$133.99
DVR Service (SD)		\$8.95	\$8.95	Perfect TV		\$71.99	\$75.94
Selecto Total (A La Carte)		\$19.95	\$19.95	Classic HBO		\$78.99	\$83.95
CableLatino		\$29.95	\$29.95	Classic Starz		\$78.99	\$83.95
CableLatino Completo		\$64.95	\$64.95	BULK Digital Silver		\$33.00	\$33.00
				BULK Digital Gold		\$49.00	\$49.00
A La Carte Premium Channels (monthly fee)				BULK Digital Platinum		\$81.00	\$81.00
Cinemax		\$15.99	\$15.99	BULK Total Premium		\$86.00	\$86.00
HBO		\$15.99	\$15.99	BULK Digital Premium		\$49.00	\$49.00
Showtime		\$15.99	\$15.99	BULK Digital Premium Plus		\$69.00	\$69.00
Starz		\$15.99	\$15.99				
TMC		\$15.99	\$15.99				
CTR		\$14.99	\$14.99				
The Filipino Channel		\$14.99	\$14.99				
GMA Pinoy TV		\$11.99	\$11.99				
RTN		\$14.99	\$14.99				
SBTN		\$14.99	\$14.99				
TV Japan		\$24.99	\$24.99				
TV5 Monde		\$9.99	\$9.99				
Filipino Pak		\$19.99	\$19.99				
Russian Pak		\$21.99	\$21.99				
Playboy		\$19.99	\$19.99				
Bulk Tenant Packages (monthly fee)		Current Rate	New Rate	Unreturned / Damaged Equipment Replacement Costs (one-time charge)			
BULK Starter (with Starz)		\$4.99	\$4.99	Video Equipment			
BULK Preferred		\$17.95	\$17.95	SD-DCH-70/100-Dig. (Mot.)		\$150.00	\$140.00
BULK Preferred Plus		\$49.00	\$49.00	HD-DCH-3200-Dig. (Mot.)		\$250.00	\$250.00
BULK Premier		\$86.00	\$86.00	HD-DCX3200-Dig (Mot.)		\$250.00	\$220.00
* \$1-less if add-on in a complex that provides Bulk Starter				HD/DVR-DCH 3416-Dual Tuner-Dig. (Mot.)		\$420.00	\$380.00
				SD/DVR-TDC 575-Vegas-Dig. (Pace)		\$310.00	\$310.00
				SD/DVR - Vegas-Dig. (Pace)		\$310.00	\$270.00
				[Pace] HD-Converter-PCRNG1 10R w/Mcard		\$130.00	\$160.00
				HD-RNG110 -Dg (Pace)		\$130.00	\$160.00
				SD/DVR-TDC 577X-Dig. (Pace)		\$330.00	\$330.00
				HD/DVR-DCX 3400-Dual Tuner-Dig. (Mot.)		NA	\$340.00
				Standard Converter		\$40.00	\$40.00
				Addressable Converter		\$60.00	\$60.00
				DCT 700 (Mot.)		\$80.00	\$80.00
				DCT 2000 - Telco w/RF Return & Dolby 5.1 (Mot.)		\$150.00	\$160.00
				DCT 2000 - Telco w/RF Return (Mot.)		\$150.00	\$160.00
				DCT 2224/1662 (Mot.)		\$150.00	\$160.00
				DCT 2500 (Mot.)		\$150.00	\$150.00
				DCT 2524/1612 (Mot.)		\$150.00	\$150.00
				DCT 5100 (Mot.)		\$310.00	\$320.00
				HD 6200 (Mot.)		\$310.00	\$310.00
				DCT 6200/2005 (Mot.)		\$310.00	\$310.00
				DCT 6208/2005 (Mot.)		\$420.00	\$420.00
				DCT 6412/2005 (Mot.)		\$420.00	\$470.00
				HD/DVR 3412 (Mot.)		\$420.00	\$380.00
				HD/DVR 3416/2305 (Mot.)		\$420.00	\$380.00
				HD/DVR 6208 (Mot.)		\$420.00	\$420.00
				HD/DVR 6412 (Mot.)		\$420.00	\$450.00
				HD/DVR 6416 (Mot.)		NA	\$450.00
				Pace Digital Adapter		\$50.00	\$50.00
Additional Equipment & Options (monthly fee)		Current Rate	New Rate				
Digital Additional Outlets (1)		\$6.99	\$7.49				
Digital Additional Outlets (2)		\$9.99	\$9.99				
Digital Additional Outlets (3)		\$9.99	\$9.99				
Digital Additional Outlets (each, after 3)		\$3.33	\$3.33				
Digital Adaptor (each, after 2, with remotes)		\$1.99	\$1.99				
HD Converter		\$8.00	\$8.00				
HD Converter/ Addition To Digital Package		\$6.50	\$6.50				
Digital Converter (SD)		\$3.20	\$3.20				
Limited-Basic Only Converter		\$1.00	\$1.00				
Remote Control		\$0.20	\$0.20				
First CableCARD		\$0.00	\$0.00				
Additional CableCARD		\$1.79	\$1.79				
Cable Modem Rental		\$3.00	\$5.00				
eMTA		\$3.00	\$5.00				
Comcast Home Networking (D2)		\$2.00	\$0.00				
Comcast Home Networking (D3)		\$5.00	\$0.00				
Service Protection Plan		\$0.99	\$1.45				

Non-standard video installations will be charged the Hourly Service Charge for the amount of time needed to complete the install. The cost of equipment and materials necessary for a non-standard installation may apply. For customers receiving service through commercial accounts or bulk rate arrangements, some product, pricing and other information contained herein may not apply. Please refer to the terms and conditions of the separate agreement. Where terms are inconsistent with information in this Products and Services Price List, the terms and conditions of the separate agreement will apply. Certain restrictions apply. Call Comcast Cable for complete details about services and prices. Certain services are available separately or as part of other levels of service. Not all services are available in all areas. Basic Service must be purchased in order to subscribe to any other optional video service or tier of video services. You must purchase or rent a converter and a remote control to receive certain services. Installation, equipment, additional outlet, change of service, programming access and other charges may apply, depending on location and services ordered. Pricing, programming, channel location and packaging may change. You must subscribe to Comcast Digital Cable and a Premium Service to receive the multiplexed version of that Premium Service. After notice of a re-tiering of our services or rate increase, you may change your level of service at no additional charge for a period of 30 days from effective date of change. Other-wise, changes in services you receive, requested or caused by you, will be subject to upgrade and downgrade charges listed above.

Attachment 4



Comcast Cable
15815 25th Ave West
Lynnwood, WA 98087

March 1, 2010

Bonnie Walton
City Clerk/Cable Manager
City of Renton
1055 S Grady Way
Renton, WA 98057

Dear Ms. Walton:

In our on-going effort to keep you informed, I am writing to notify you that Comcast is eliminating its equipment rental fees for high definition (HD) video services for virtually all of our customers.

Effective April 1, 2010, Comcast will no longer charge monthly HD equipment rental fees. Customers who receive HD video services will now, however, be charged a \$6.50 HD Technology Fee.^[1] There will be no change in Comcast's existing HD DVR Service Fees, which will now include the HD Technology Fee.

This HD Technology Fee will help Comcast to recover the additional costs incurred in upgrading its network to provide HD television services. Comcast has invested millions of dollars in its network to provide these advanced video services to its customers.

The HD Technology Fee applies to each television outlet served by Comcast receiving high definition video services.

Please feel free to call me at (253) 288-7496 if you have any questions.

Sincerely,

Terry Davis
Director, Franchising and Government Affairs

cc: Janet L. Turpen, Comcast
Ken Rhoades, Comcast
Bradley & Guzzetta, LLC

[1] The sole exception will be for "basic-only" customers who do not obtain any advanced video services from Comcast, except for the reception of high definition basic service which includes broadcast high definition channels.



Comcast Cable
15815 25th Ave West
Lynnwood, WA 98087

March 1, 2010

Lorrie Rempher
Information Services Director
City of Auburn
25 West Main St
Auburn, WA 98001

Dear Ms. Rempher:

In our on-going effort to keep you informed, I am writing to notify you that Comcast is eliminating its equipment rental fees for high definition (HD) video services for virtually all of our customers.

Effective April 1, 2010, Comcast will no longer charge monthly HD equipment rental fees. Customers who receive HD video services will now, however, be charged a \$6.50 HD Technology Fee.^[1] There will be no change in Comcast's existing HD DVR Service Fees, which will now include the HD Technology Fee.

This HD Technology Fee will help Comcast to recover the additional costs incurred in upgrading its network to provide HD television services. Comcast has invested millions of dollars in its network to provide these advanced video services to its customers.

The HD Technology Fee applies to each television outlet served by Comcast receiving high definition video services.

Please feel free to call me at (253) 288-7496 if you have any questions.

Sincerely,

Terry Davis
Director, Franchising and Government Affairs

cc: Janet L. Turpen, Comcast
Ken Rhoades, Comcast
Dennis Seley, City of Auburn
Bradley & Guzzetta, LLC

[1] The sole exception will be for "basic-only" customers who do not obtain any advanced video services from Comcast, except for the reception of high definition basic service which includes broadcast high definition channels.



Comcast Cable
10 River Park Plaza
St. Paul, MN, 55107

March 19, 2010

Ms. Cor Wilson
Executive Director
North Suburban Cable Commission
950 Woodhill Drive
Roseville , MN 55113

Dear Cor:

In our on-going effort to keep you informed, I am writing to notify you that Comcast is eliminating its equipment rental fees for high definition video services for virtually all of our customers.

Effective May 1, 2010, Comcast will no longer charge monthly HD equipment rental fees. Customers, who receive high definition video services will now, however, be charged a \$7.00 HD Technology Fee¹. There will be no change in Comcast's existing DVR Service Fees, which will now include the HD Technology Fee.

This HD Technology Fee will help Comcast to recover the additional costs incurred in upgrading its network to provide high definition (HD) television services. Comcast has invested millions of dollars in its network to provide these advanced video services to its customers.

The HD Technology Fee applies to each television outlet served by Comcast receiving high definition video services.

Please feel free to call me at 651-493-5776 if you have any questions.

Sincerely,

Kathi Donnelly-Cohen
Director of Government Affairs
Comcast – Twin Cities Region

¹ The sole exception will be for "basic-only" customers who do not obtain any advanced video services from Comcast, except for the reception of high definition basic service which includes broadcast high definition channels.

Attachment 5

Pass The Community Access Preservation Act - HR 3745

Go to www.alliancecm.org/CAP for more information

From: Donnelly-Cohen, Kathi [mailto:Kathi_Donnelly-Cohen@cable.comcast.com]
Sent: Sunday, April 18, 2010 2:20 PM
To: Cor Wilson
Cc: Coleman, Emmett
Subject: RE: kdc letter 3-19-10_0001.pdf

Cor:

Sorry it's taken me a while to get back to you regarding your email of March 23.

Today, customers who subscribe to one of Comcast's service tiers above our most limited basic tier pay a \$7.00 HD Equipment Fee for each high-definition cable box in their home. After this change, they will instead pay a \$7.00 HD Technology Fee per each HD outlet in their home. The HD Technology Fee will include a HD capable cable box. The net effect is no increase in the total price the customer is currently paying.

Comcast Limited Basic customers who watch HD basic channels and lease an HD cable box from us will not transition to a HD Technology Fee. They will continue to pay the HD Equipment Fee for each high-definition cable box these lease from us because they do not purchase a level of service that includes advanced HD features provided as part of higher levels of service. The equipment rate is below the maximum regulated rate.

We have chosen to transition from an HD Equipment Fee to an HD Technology Fee for several reasons, including:

1. The investments we make to deliver HD to consumers' homes go beyond the use of an HD cable box. We provide increasing access to advanced video services such as two-way HD technologies and are making network improvements that support the delivery of a large and growing number of HD channels on our systems. We believe these investments are more appropriately reflected in terms of an "HD Technology Fee" that is inclusive of the use of an HD cable box.
2. Competing multichannel video providers have chosen to apply a technology fee (and an equipment lease fee, in some cases) to their HD services. For example, DirecTV and EchoStar charge a \$10 HD Access Fee per home in addition to a \$5 Equipment Lease Fee per each outlet beyond the first. AT&T U-Verse charges a \$10 HD Technology Fee per home. Verizon currently charges a \$9.99 HD Receiver fee for each outlet. We have chosen to apply a single HD Technology Fee for each outlet at this time.

Thank you for your inquiry and the opportunity to explain our transition to a HD Technology Fee.

Kathi Donnelly-Cohen
Director - Government Affairs - Twin Cities Region
COMCAST

NEW ADDRESS AND PHONE AS OF 7/1/09
10 River Park Plaza
St. Paul, MN 55107
Phone - 651-493-5776
Fax - 651-493-5275
Mobile - 651-261-7562

CONFIDENTIALITY NOTICE

This communication is only for the use of the intended recipient and may contain information that is privileged, confidential or otherwise protected from disclosure. If you are not the intended recipient or the employee or agent responsible for delivering this communication to the intended recipient, you are hereby notified that any reading, distribution or copying of this communication is strictly prohibited. If you have received this communication in error, please notify us by telephone and then destroy this communication in its entirety. Thank you.

From: Cor Wilson [mailto:cwilson@ctv15.org]
Sent: Tuesday, March 23, 2010 4:42 PM
To: Donnelly-Cohen, Kathi
Subject: kdc letter 3-19-10_0001.pdf

Kathi –

In regards to the attached letter, please explain the difference between the \$7 monthly fee for the HD receiver and the \$7 technology fee.

Thanks –

.cor.

Coralie A. Wilson

Executive Director
NSCC/NSAC(CTV)
950 Woodhill Dr.
Roseville, MN 55113
651-792-7500
www.ctvnorthsuburbs.org

Pass The Community Access Preservation Act - HR 3745
Go to www.alliancecm.org/CAP for more information

_____ Information from ESET NOD32 Antivirus, version of virus signature database 5045 (20100420)

The message was checked by ESET NOD32 Antivirus.

<http://www.eset.com>

CERTIFICATE OF SERVICE

I, Stephen J. Guzzetta, hereby certify that I have caused to be mailed this 21st day of June 21, 2010, copies of the foregoing Comments of the City of Seattle, Washington; the City of Tacoma, Washington; the City of Renton Washington; the City of Maple Valley, Washington; the City of Des Moines, Washington; the City of University Place, Washington; the City of Longview, Washington; the City of Issaquah, Washington; the City of Spokane, Washington; the City of Kirkland, Washington; the City of Milton, Washington; the City of Minneapolis, Minnesota; the City of Bloomington, Minnesota; the City of Coon Rapids, Minnesota; the City of Springfield, Oregon; the Metropolitan Area Communications Commission; the Rainier Communications Commission; the Ramsey/Washington Counties Suburban Cable Communications Commission II; the North Metro Telecommunications Commission; the North Suburban Communications Commission; and the South Washington County Telecommunications Commission, by first-class mail, postage prepaid, or to be delivered as otherwise indicated below, to the following persons:

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