



June 21, 2010

VIA ELECTRONIC FILING

William T. Lake
Chief, Media Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc.*, MB Docket No. 10-56

Dear Mr. Lake:

DIRECTV submits this letter to request that certain information it is submitting in connection with its comments in this proceeding be afforded protection as “Highly Confidential Information” pursuant to the *Second Protective Order*.¹ Specifically, in support of its comments, DIRECTV cites to data from a statistical and economic analysis of the effect on subscribership of introducing local-into-local service, which was previously submitted to the Commission in 2007 in connection with the Liberty Media–DIRECTV transaction.² Commercially sensitive portions of that submission were designated as Highly Confidential under the protective order governing that proceeding, and DIRECTV requests that all portions of the report that were afforded such status in that proceeding be granted Highly Confidential status in this proceeding, as well.

The data at issue constitutes some of DIRECTV’s most sensitive business information. It includes detailed financial information, such as:

- the percentage by which subscribership grew as a result of DIRECTV’s implementation of local-into-local service;
- average monthly gross customer-addition rates over various time periods;
- average monthly customer-disconnect rates over various time periods; and
- estimates of the effect that the absence of local-into-local service had on DIRECTV subscribership.

¹ *Comcast Corporation, General Electric Company and NBC Universal, Inc.*, Second Protective Order, 25 FCC Rcd. 2140 (MB 2010) (“*Second Protective Order*”).

² Klein, Benjamin; Lerner, Andres; and Dacey, Emmett, “An Economic Analysis of DIRECTV Providing Local-Into-Local Service via Satellite in All 210 DMAs,” *attached to* Letter from William M. Wiltshire to Marlene H. Dortch, MB Docket No. 07-18 (filed Aug. 23, 2007).

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William T. Lake
June 21, 2010
Page 2 of 2

Granting Highly Confidential protection to this data would be consistent with the protections the Commission has already granted in the *Second Protective Order*. There, it granted Highly Confidential status to Comcast's "[d]etailed [f]inancial [d]ata" and "[d]etailed [c]ustomer [d]ata," including cost and revenue data, churn data and other information that could allow competitors to "discern trends over time."³ The data at issue here similarly relates to costs and revenues and would allow competitors to discern meaningful trends over time, and therefore merit protection.

DIRECTV represents that it keeps these data confidential, that the data at issue are not available from public sources, and that the data would, if released to competitors, allow those competitors to gain a significant advantage in the marketplace. Accordingly, DIRECTV requests that the data be granted highly confidential protection, as it was afforded when previously submitted.

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV

³ *Id.*, ¶ 6.

CERTIFICATE OF SERVICE

I hereby certify that, on this 21st day of June, 2010, a copy of the foregoing Comments of

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