

All video content is self-produced.

2. Fandango and Movies.com

Video content is from Video Detective (movie trailers), electronic press kits, other promotional content provided directly from the movie studios, entertainment video provided by the Associated Press, and some self-produced content.

3. Comcast.net and Fancast

As to Comcast.net and Fancast, information and data responsive to this subpart have been provided as Exhibit 8.3, which is included on the enclosed compact disc labeled “Comcast Exhibits.” This spreadsheet lists providers whose content is carried by Comcast.net, Fancast.com, and Fancast Xfinity TV, and specifies which OVPD carries content from each listed provider.

**C. Other Networks**

1. ExerciseTV

All content available on ExerciseTV’s website consists of programs that are fully owned and controlled by ExerciseTV.

2. Golf

A significant portion of video content on Golf websites is produced internally by Golf, with the remainder provided by the PGA TOUR (news highlights), the LPGA Tour (news highlights and limited streaming of coverage), the European Tour (news highlights), PGA of America (news highlights), Augusta National/Thought Equity (news highlights), and The R&A (news highlights and archive materials). Website visitors can also view resort-produced videos in connection with advertising arrangements on certain WorldGolf domains.

3. Sprout

Sources of content on Sprout include HIT Entertainment, PBS, Sesame Workshop, MLB, Decode Enterprises, Jam Media, Doggity’s Diner, Inc., Moonscoop Entertainment, the Wiggles International PTY, LTD, and the Jim Henson Company, Inc.

4. RSNs/The Comcast Network/NECN

Either the sports leagues or their member teams are the copyright holders in the RSNs’ professional games. Due to restrictions on online

distribution that historically have been imposed by the applicable sports leagues, the OVPDs affiliated with the RSNs and The Comcast Network distribute videos that are, for the most part, not sporting events or highlights of sporting events. Non-sporting-event content is generally owned by the particular network that distributes it. More recently, the NBA reached an agreement with those RSNs that hold rights to NBA team games, which allows the applicable RSNs to distribute NBA games, game highlights, and certain related team content online. During the 2009-2010 NBA season, NBA game content was distributed through the RSNs' websites (either in the form of highlights and clips or, in the case of Comcast SportsNet Philadelphia and Comcast SportsNet Chicago, even as full-length live streamed games). For example, a small package of late-season Chicago Bulls games were distributed at no charge to authenticated viewers on [www.csnchicago.com](http://www.csnchicago.com), and 67 Philadelphia 76ers games were made available to authenticated viewers throughout the 2009–2010 season via paid subscription on [www.csnphilly.com](http://www.csnphilly.com).

From prior to 2006 and through April 1, 2010, NECN's website showed some "current news" footage video from stories that were first exhibited on the linear network or were licensed from ABC News One. On April 1, 2010 NECN entered into a similar arrangement with CNN News Source.

In general, the RSNs, NECN, and The Comcast Network own the non-game video content they distribute, subject to third-party rights and restrictions in certain elements, such as game highlights. In February 2010, however, the CSN-Bay Area and CSN-California websites (i.e., [csnbayarea.com](http://csnbayarea.com) and [csncalifornia.com](http://csncalifornia.com), respectively) distributed The MMAX, a 30-minute show owned by Gary Gelfand.

5. Versus

Online rights to live sports events, and clips and highlights thereof distributed on [Versus.com](http://Versus.com), are owned by the applicable rights holder, such as the NHL, PBR, and IRL. [Versus.com](http://Versus.com) distributed the international feed of the Tour De France in 2009, and plans to do so again in 2010. This content is owned by the Amaury Sport Organisation.

6. Comcast Hometown Network/Pittsburgh Cable News Channel/CN100/C2

All video content is self-produced.

9. **For each Online Video Programming Distributor identified in the response to Request #8 and which the Company owns, operates, or manages, identify each mechanism by which the Company makes Video Programming available to end users on the Internet, and identify all Video Programming content that the Company makes available to end users through each of these mechanisms.**

Comcast's OVPDs employ a variety of mechanisms to make video programming available to end users on the Internet.

- ***Authenticated/subscription basis.*** Comcast makes certain video programming available on an authenticated basis, meaning that such programming is available online to individuals who receive the programming through a traditional, linear MVPD subscription. Comcast's OVPDs offering video programming on an authenticated basis include: CSN-Chicago, CSN-Philadelphia, Music Choice, and Fancast Xfinity TV.
- ***Transactional basis.*** Comcast makes certain video programming available on a transactional basis, meaning that users can pay a one-time fee to watch and/or own a particular episode or movie. Comcast's OVPDs offering video programming on a transactional basis include: E!, G4, style, ExerciseTV, and the Fancast Store.
- ***Ad-supported basis.*** Comcast makes certain video programming available for free, on an ad-supported basis. Consumers do not need any subscription and do not pay any fee to access and view this content. It is available to anyone on the Internet. Comcast's OVPDs offering free, ad-supported content include the following: Fandango, Fancast, Comcast.net, Movies.com, Daily Candy, E!, Golf Channel, Versus, Style, G4, PBS Kids Sprout, TV One, CSN-Bay Area, CSN-California, CSN-Chicago, CSN-Mid-Atlantic, CSN-New England, CSN-Northwest, CSN-Philadelphia, Comcast Sports Southeast, Comcast Sports Southwest, NECN, SportsNet New York (SNY), FEARnet, MGM, TV One, The Mtn, The Comcast Network, Comcast Hometown Network, Pittsburgh Cable News, CN100, and C2.

The principal sources of programming made available via each of these mechanisms are identified in the production responsive to Request 8. See the Response to Request 22 for details on the authenticated streaming video offered by CSN-Chicago and CSN-Philadelphia.

10. **For each Online Video Programming Distributor identified in the response to Request #8 and which the Company owns, operates, or manages, provide: the cost per subscriber to the Company of acquiring distribution rights to Video Programming for distribution on the Internet; revenues (categorized by (i) subscription fees, (ii) advertising revenues, and (iii) other); number of unique users; videos viewed; total and average time spent viewing videos; total streams; ad impressions; click through rates; and any other metric commonly used by the Company to measure or track information regarding the Company's Online Video Programming Distributor's website.**

Information and data responsive to this subpart have been provided in as Exhibit 10, which is included on the enclosed compact disc labeled "Comcast Exhibits."

For the metrics requested by the FCC with respect to Request 10, Comcast has provided the data available in the ordinary course of business. Where Comcast does not maintain the metric requested, it has either provided a reasonable substitute or has noted that such data is unavailable. Where Exhibit 10 does not reflect information for an OVPD identified in the response to Request 8, it is because Comcast does not maintain such metrics for these OVPDs in the ordinary course.

For the OVPDs identified in the response to Request 8 that Comcast owns, operates, or manages, Comcast does not maintain data on the cost per subscriber to the Company of acquiring distribution rights to Video Programming for distribution on the Internet. As discussed in its responses to Requests 8 and 9, the only OVPDs owned, operated or managed by Comcast that distribute third-party Video Programming to authenticated subscribers over the Internet are Fancast Xfinity TV and web sites affiliated with CSN-Chicago and CSN-Philadelphia. The Company, however, does not pay per-subscriber fees to acquire rights to distribute this Video Programming over the Internet. Instead, Comcast has acquired these rights either as part of a broader rights agreements or through payment of discrete license fees.

With two exceptions, Comcast's OVPDs do not offer subscription-based services. Consequently, there are no subscription fees generated by these providers indicated on Exhibit 10. The exceptions are: (i) ExerciseTV's online video subscription services; and (ii) Comcast SportsNet Philadelphia's authenticated, pay-subscription-based streaming of Philadelphia 76ers games on [www.csnphilly.com](http://www.csnphilly.com) during the 2009–2010 season.

- 11. Submit all market studies, forecasts, and surveys, prepared internally or by outside parties, that were prepared for, presented to, reviewed by, discussed by, or considered by the Company's board of directors or the Company's executive management, or any member thereof, concerning customer attitudes toward and demand for video service, including, but not limited to, MVPD, VOD, PPV, and online video services.**

Any responsive documents have been produced herewith.

- 12. Identify any other investments or other holdings the Company has made to provide video distribution and programming on the Internet, including any facilities and network assets, leased or owned. Identify when such investments were made, the costs of such investments, and any contracts or agreements associated with such investments.**

Comcast has made investments in certain entities that provide services that facilitate the provision of video distribution and programming on the Internet. These entities are identified and described below.

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In conjunction with each of the investments above, the major contracts to which Comcast Interactive Capital is a party include the following: Stock Purchase Agreement, Investors Rights Agreement, Voting Agreement, and Co-Sale Agreement.

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13. **Identify any corporate or other entity not previously identified in which the Company owns 5% or more of the issued and outstanding stock of any class or in which the Company otherwise has an Attributable Interest and, for each, provide the following:**
- a. The name of the entity;**
  - b. The lines of business of the entity;**
  - c. The executive officers of the entity; and**
  - d. Whether the Company will contribute such entity to the Transaction.**

Please find listed below those entities for which Comcast owns at least 5% but less than 100% and which Comcast does not control.

For many of these investments, Comcast maintains little or no information. For instance, Comcast does not capture officer information on such investments. Thus, please note that in fields marked with an asterisk (\*), Comcast does not maintain or have access to the requested information.

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
@Security Broadband Corp. (DE)	Creates home security systems and other lifestyle products	*	No
Beaumaris Networks, Inc. (DE)	Video session resource management	*	No
BelAir Networks, Inc. (Canada)	Mesh wireless equipment provider	*	No
BlackArrow, Inc. (DE)	Cross-platform video ad management system	*	No
Broadlogic Network Technologies Inc. (DE)	Wideband video processing chipset	*	No
Bubble Motion, Inc. (DE)	Mobile messaging and social media applications	*	No
Canoe Ventures, LLC (DE)	Advance advertising joint venture for cable industry	*	No
CarWoo, Inc. (DE)	Automobile buying site for	*	No

<sup>10</sup> In each case, these entities are not wholly owned by Comcast. A “Yes” response means that Comcast’s interest in the entity, not the entity itself, is being contributed to the joint venture.

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
	dealers and consumers		
Cedar Point Communications, Inc. (DE)	Integrated VoIP multimedia switch	*	No
Clearwire Communications LLC (DE)	Operating company for the wireless Internet service provider	*	No
Combined Conditional Access Development and Support, LLC (DE)	Development of software for conditional access technology		No

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
		]]	
Darby Technology Ventures Group, LLC (DE)	Venture capital fund	*	No
DemDex, Inc. (DE)	Data management platform	*	No
Disson Skating, LLC (PA)	To produce, own and market figure skating shows, gymnastics events and similar family programs to be broadcast on network and/or cable TV and/or any other broadcast medium	*	No
DoubleVerify, Inc. (DE)	Online advertising verification platform	*	No
DriverTV LLC (NY)	Leading provider of automobile-related video content for consumers	*	No

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
E! Distribution, L.L.C. (DE)	Performs certain ad sales functions for E! Entertainment Television Latin America Partners	*	Yes
E! Entertainment Television Latin America Partners (NY)	Operates and distributes the "E!" branded channel in Latin America	*	Yes
EdgeConneX, Inc. (DE)	Collocation services at wireless tower locations for service providers	*	No
ErDOS LLC (DE)	Holds patent portfolio	*	No
First Round Capital 2007 Annex Fund, LLC (DE)	Venture capital fund	*	No
First Round Capital 2007, LLC (DE)	Venture capital fund	*	No
Genacast Ventures, LLC (DE)	Venture capital fund		No
Global Spectrum (NEC), d.o.o. (Croatia)	Sports/entertainment and facility management company in Croatia	*	No
Global Spectrum Asia Ltd. (British Virgin)	Sports/entertainment and facility management	*	No

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
Islands)	company in the BVI		
Global Spectrum Pico Pte. Ltd. (Singapore)	Sports/entertainment and facility management company in Singapore	*	No
iControl Networks, Inc. (DE)	Home security platform for broadband providers	*	No
}}		*	}}
Jingle Networks, Inc. (DE)	Free directory assistance and audio ad network	*	No
JiWire, Inc. (DE)	Mobile audience advertising network	*	No
}}		*	}}
MGM Holdings, Inc. (DE)	Holding company for Metro-Goldwyn-Mayer, Inc.	[[	No

<b>Name of Entity</b>	<b>Lines of Business</b>	<b>Executive Officers</b>	<b>Comcast's Interest Contributed to Joint Venture?<sup>10</sup></b>
Music Choice (PA)	Programs music and produces music-related content for digital cable, cell phones, and cable modem subscribers in the US	*	No

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
Music Holdings Corp. (DE)	Nominee holder of Comcast's interest in Muzak Holdings LLC, a former leader in business music services, but it filed bankruptcy in February 2009	*	No
National Cable Communications LLC (DE)	Spot cable ad representation firm	*	No
OCAP Development, LLC (DE)	Has license rights to OCAP software	*	No
Ortiva Wireless, Inc. (DE)	Mobile video optimization	*	No
PackLate.com, Inc. (DE)	Discount rental property consumer website	*	No
RGB Networks, Inc. (DE)	High density video processing equipment	*	No
Sedna Patent Services, LLC (DE)	Holds patents and licenses	*	No
SKC Hangar Partners (PA)	Lessee of airplane hanger	*	No
Skyview T. V. Inc. (MT)	Montana cable company	*	No

Name of Entity	Lines of Business	Executive Officers	Comcast's Interest Contributed to Joint Venture? <sup>10</sup>
SportsBLOGS, Inc. (DE)	Online network of owned and operated sports communities	*	No
The New York Interconnect L.L.C. (DE)	Ad sales interconnect	*	No
TidalTV, Inc. (DE)	Online video advertising network	*	No
Verivue, Inc. (DE)	Next generation video distribution server	*	No
Visible World Inc. (DE)	Targeted advertising technology for video service providers	*	No
Vitruv, Inc. (DE)	Social media marketing platform	*	No
Vyatta, Inc. (DE)	Open source routing	*	No

14. **Provide a list of the Company’s current channel line-ups which shows the percentage of programming channels currently owned, operated, managed, or attributed to the Company as well as the percentage of channels that the Company will own post-acquisition.**

A representative channel lineup from [[ ]] as of 2009 is attached as Appendix D.

For each of these channel lineups, the chart on the following page shows the total number of channels and the number and percentage of programming channels currently owned, operated, managed, or attributed to each of Comcast and NBCU. The chart also displays the number and percentage of channels that the combined entity will own, operate, manage, or be attributed with post-acquisition. The channel counts and attributions were performed manually using reasonable best efforts to analyze the listings from the 41 channel lineups, and the percentage calculations were then performed by the spreadsheet.

The analysis shows that [[ ]], the combined entity will own, operate, manage, or be attributed with approximately 14.1% of programming channels carried on Comcast’s cable systems. This analysis confirms the accuracy of Comcast’s assertion in the Public Interest Statement that nearly six out of every seven channels carried by Comcast will be unaffiliated with the combined entity post-transaction.<sup>11</sup>

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<sup>11</sup> See Public Interest Statement at 78.

<u>Location</u>	<u>Total # of Channels Carried</u>	<u># of Comcast-affiliated Channels (Pre-Transaction)</u>	<u>Comcast % of Channels (Pre-Transaction)</u>	<u># of NBCU-affiliated Channels (Pre-Transaction)</u>	<u>NBCU % of Channels (Pre-Transaction)</u>	<u># of Channels Attributed to Combined Entity Post-Transaction</u>	<u>Combined Entity % of Channels</u>
Albuquerque, NM	213	9	4.2%	21	9.9%	30	14.1%
Atlanta, GA	229	12	5.2%	20	8.7%	32	14.0%
Baltimore County, MD	230	13	5.7%	18	7.8%	31	13.5%
Barnstable, MA	76	5	6.6%	11	14.5%	16	21.1%
Berkeley, CA	242	11	4.6%	19	7.9%	30	12.5%
Boulder, CO	216	10	4.6%	20	9.3%	30	13.9%
Branford, CT	195	11	5.6%	20	10.3%	31	15.9%
Celebration, FL	217	10	4.6%	19	8.8%	29	13.4%
Channahon, IL	210	12	5.7%	20	9.5%	32	15.2%
Chicago Heights, IL	219	11	5.0%	17	7.8%	28	12.8%
Davis, CA	224	13	5.8%	17	7.6%	30	13.4%
Grand Rapids, MI	205	11	5.4%	17	8.3%	28	13.7%
Harrisburg, PA	181	12	6.6%	17	9.4%	29	16.0%
Houston, TX	279	10	3.6%	20	7.2%	30	10.8%
Indianapolis, IN	206	13	6.3%	18	8.7%	31	15.0%
Jackson, MS	195	11	5.6%	16	8.2%	27	13.8%
King County, WA	247	12	4.9%	18	7.3%	27	10.9%
Kiski/Saltsburg, PA	195	11	5.6%	16	8.2%	27	13.8%
McHenry, IL	226	12	5.3%	18	8.0%	30	13.3%
Miami, FL	218	12	5.5%	23	10.6%	35	16.1%
Missouri	199	10	5.0%	14	7.0%	24	12.1%
Montgomery County North, PA	201	10	5.0%	18	9.0%	28	13.9%
Murfreesboro, TN	210	10	4.8%	17	8.1%	27	12.9%
Ogle County, IL	191	11	5.8%	19	9.9%	30	15.8%
Okeechobee, FL	196	10	5.1%	14	7.1%	24	12.2%
Paducah, KY	164	6	3.7%	13	7.9%	19	11.6%
Palm Beach County West, FL	213	11	5.2%	19	8.9%	30	14.1%
Pompano, FL	208	13	6.3%	18	8.7%	31	14.9%
Portland Metro, OR	222	12	5.4%	16	7.2%	28	12.6%
Prince George's County, MD	242	12	5.0%	20	8.3%	32	13.2%
Salt Lake City, UT	232	13	5.6%	19	8.2%	32	13.8%
Savannah, GA	175	10	5.7%	16	9.1%	26	14.9%
Scranton, PA	228	13	5.7%	16	7.0%	29	12.7%
SE Michigan	179	11	6.1%	20	11.2%	31	17.2%
Snohomish County, WA	251	12	4.8%	19	7.6%	31	17.2%
St. Paul, MN	206	14	6.8%	18	8.7%	32	15.5%
State College, PA	196	12	6.1%	16	8.2%	28	14.3%
Tacoma, WA	250	12	4.8%	18	7.2%	30	12.0%
Tucson, AZ	238	12	5.0%	19	8.0%	31	13.0%
Union, NJ	232	11	4.7%	20	8.6%	32	13.3%
York, PA	200	13	6.5%	19	9.5%	32	16.0%

**AVERAGE  
ACROSS ALL  
SUB-REGIONS**      **14.1%**

15. **Provide a pro-forma annual financial three-statement model (i.e., income statement, balance sheet and cash flow statement) for the Company with projections through 2014, if possible broken down separately by Company-wide data, and by individual business unit.**

Comcast has not prepared a formal pro forma balance sheet and income statement related to the proposed transaction on a consolidated Comcast basis. In response to this Request, Comcast has prepared the pro forma income statement and balance sheet provided in Excel spreadsheet format as Exhibit 15, which is included on the enclosed compact disc labeled “Comcast Exhibits.” The income statement and balance sheet contained in Exhibit A have been prepared based on the historical and pro forma information available to date. The historical consolidated financial statements of Comcast Corporation as of December 31, 2009 have been derived from the Comcast Corporation Form 10-K filed with the United States Securities and Exchange Commission on February 23, 2010. The historical consolidated financial statements of NBC Universal Inc. (“NBCU”) as of December 31, 2009 have been derived from the NBCU Debt Offering Memorandum dated April 27, 2010 (“Offering Memorandum”). The Offering Memorandum also includes a pro forma balance sheet and income statement reflecting the financing by NBCU for the transaction and acquisition-related adjustments. These adjustments have also been used to develop these pro forma financial statements. Additional pro forma adjustments include the impact of Comcast’s financing for the transaction, recording the income tax provision and elimination entries between Comcast and NBCU. These pro forma financial statements contained in Exhibit 15 assume that the transaction closed on January 1, 2009, in the case of income statement information, and December 31, 2009, in the case of balance sheet information.

In response to the request for information by individual business unit, the statements contained in Exhibit 15 divide the December 31, 2009 Comcast Corporation consolidated amounts into three segments. These segments do not reflect Comcast’s current externally reported segments. Business-segment information is only provided through operating income as Comcast does not allocate non-operating items, including interest and income taxes, on a segment basis.

As a result of the transaction, control of NBCU will change from GE to Comcast and therefore, NBCU’s assets and liabilities will be re-measured to fair value, and the assets of the Comcast content businesses will be carried over at historical book value. The accounting for the transaction depends on certain valuations and other studies that have yet to progress to a stage where there is sufficient information for a definitive measurement. A detailed valuation analysis has not been performed, and therefore the adjustments to allocate the purchase price to the assets and liabilities are based upon a very preliminary estimate of their fair values. The actual purchase price allocation will be different from that which is presented herein, and the difference could be material.

Pro forma cash flow statements have not been previously prepared by Comcast or NBCU and are not prepared or used by either company in the ordinary course of business.

Because of the significant number of very preliminary assumptions and lack of sufficient information, this pro forma information contained in Exhibit 15 is for illustrative purposes only and is not intended to represent or be indicative of what Comcast's financial condition, results of operations, or cash flows would have been had the transaction occurred on the dates indicated. The pro forma financial information also should not be considered representative of Comcast's future financial condition or results of operations.

A document containing responsive financial projections is being produced herewith.

16. **Provide the minimum acceptable internal return on investment (“hurdle rate”) that the Company uses for evaluating capital investments, and/or the typical payback period used for evaluating capital investments. If Comcast does not evaluate new investments in this way, the Company should describe how it discounts future revenues and costs in whatever method it uses to evaluate new investment projects.**

In evaluating capital investments, Comcast generally uses a {{ }} weighted average cost of capital as the minimum acceptable internal return on investment.

17. **Submit a copy of each (1) The Nielsen Company report; (2) ComScore report; (3) Centris report; and (4) any other third-party report on MVPD, Video Programming or online video usage regularly used by the Company, and describe all research using (1) The Nielsen Company; (2) ComScore; (3) Centris; and (4) any third-party data, including any and all electronic versions of any such report.**

Any responsive documents have been produced herewith.

18. **To the extent not provided in response to another inquiry, provide all agreements and similar documents relating to the Transaction, including but not limited to all attachments, appendices, side or separate letter agreements to the Master Agreement and similar documents by and among the Applicants, their Subsidiaries, Affiliates, or any subset thereof.**

Responsive documents identified by the Commission have been produced herewith.

19. **To the extent not provided in response to another inquiry, provide a projected/draft organization chart for the post-Transaction NBC Universal, as that entity is defined in the Application. For any person identified on the organization chart, describe whether such persons will also hold other positions within the Company or NBCU and, if so, describe such position. Provide a list of the Company's investments and ownership identified in response to Requests # 3, 6, 8, 12, 13, 28, and 29 that are not part of the joint venture and describe why such assets will be excluded from the joint venture.**

No projected or draft organization chart is available for post-Transaction NBC Universal. The Company's investments and ownership interests that will not be contributed to the joint venture are described below.

- **Interests Identified in Response to Request 3.** None of the cable systems identified in response to Request 3 will be contributed to the joint venture because they are not part of Comcast's content business and the joint venture is content-focused.
- **Interests Identified in Response to Request 6.** Comcast's interests in the following Non-Broadcast Programming Networks identified in response to Request 6 will not be contributed to the joint venture because the networks are not currently treated as part of Comcast's content business, are local in nature, and are considered complementary to Comcast's local cable distribution systems:

Comcast Hometown Television  
C2  
CN100  
Comcast Television Network  
Pittsburgh Cable News

Comcast's interests in the following Non-Broadcast Programming Networks identified in response to Request 6 will not be contributed to the joint venture because they are not part of Comcast's majority owned or managed content business:

Current Media  
MLB Network  
NHL Network

- **Interests Identified in Response to Request 8.** The following OVPDs identified in response to Request 8 will not be contributed to the joint venture because Comcast considers these online properties to be part of its distribution business:

Fancast  
Comcast.net

Comcast's interests in the following OVPDs identified in response to Request 8 will not be contributed to the joint venture because they are not currently treated as part of Comcast's content business, are local in nature, and are considered complementary to Comcast's local cable distribution systems:

Comcast Hometown Television  
C2  
C100  
Pittsburgh Cable News

Comcast's interests in the following OVPDs identified in response to Request 8 will not be contributed to the joint venture because they are not part of Comcast's majority owned or managed content business:

Current Media  
MLB Network

NHL Network  
MGM  
Music Choice

- **Interests Identified in Response to Request 12.** None of Comcast’s interests relating to the provision of video distribution and programming on the Internet as identified in response to Request 12 will be contributed to the joint venture. These are investments by Comcast’s venture capital arm, Comcast Interactive Capital (“CIC”). None of CIC’s investments are being contributed to the joint venture because they are not part of Comcast’s content business.
- **Interests Identified in Response to Request 13.** The following of Comcast’s interests identified in response to Request 13 will not be contributed to the joint venture because they are not part of Comcast’s majority owned or managed content business:

@Security Broadband Corp  
Beumaris Networks, Inc.  
BelAir Networks, Inc.  
BlackArrow, Inc.  
Broadlogic Network Technologies Inc  
Bubble Motion, Inc.  
Canoe Ventures, LLC  
CarWoo, Inc.  
Cedar Point Communications, Inc.  
Clearwire Communications LLC  
Combined Conditional Access Development and Support, LLC  
Darby Technology Ventures Group, LLC  
DemDex, Inc.  
Disson Skating, LLC  
DoubleVerify, Inc.  
DriverTV LLC  
EdgeConneX, Inc.  
Erdos LLC  
First Round Capital 2007 Annex Fund, LLC  
First Round Capital 2007, LLC  
Genacast Ventures, LLC  
Global Spectrum (NEC), d.o.o.  
Global Spectrum Asia Ltd.  
Global Spectrum Pico Pte. Ltd.  
iControl Networks, Inc.  
{ }  
Jingle Networks, Inc.  
JiWire, Inc.  
{ }  
MGM Holdings, Inc.

Music Choice  
Music Holdings Corp.  
National Cable Communications LLC  
OCAP Development, LLC  
Ortiva Wireless, Inc.  
PackLate.com, Inc.  
RGB Networks, Inc.  
Sedna Patent Services, LLC  
SKC Hangar Partners  
Skyview T. V. Inc.  
SportsBLOGS, Inc.  
The New York Interconnect L.L.C  
TidalTV, Inc.  
Verivue, Inc.  
Visible World Inc.  
Vitruve, Inc.  
Vyatta, Inc.

- **Interests Identified in Response to Request 28.** Comcast's interest in thePlatform, as described in response to Request 28, will not be contributed to the joint venture because it is not part of Comcast's content business and Comcast considers thePlatform ancillary to its distribution service.
- **Interests Identified in Response to Request 29.** Comcast's interest in iN DEMAND, LLC, as described in response to Request 29, will not be contributed to the joint venture because it is not part of Comcast's content business and Comcast considers the pay-per-view and VOD offerings provided by iN DEMAND to be ancillary to Comcast's distribution service.

**20. Provide all agreements currently in effect and all agreements executed since January 1, 2006 between the Company and any other Person that grant online video distribution rights to the Company. Identify any agreements that grant exclusive online video distribution rights to the Company.**

Copies of online rights agreements covering long-form content are being produced herewith.

Copies of retransmission consent agreements containing online rights provisions are being produced herewith.

Comcast has online rights agreements for the use of short-form content, such as brief clips or show segments. This short-form content is generally offered by entertainment programming providers for promotional purposes and made universally available to distributors. Comcast also receives some short-form content in the news and sports

categories. A list of such short-form agreements is provided in Excel spreadsheet format as Exhibit 20.1,<sup>12</sup> which is included on the enclosed compact disc labeled “Comcast Exhibits.” Examples of short-form agreements covering multiple programming genres are being produced herewith.

In addition, there are a significant number of programming affiliation agreements that include most favored nation (“MFN”) clauses that potentially implicate online rights or other clauses that briefly mention online rights. The MFN provisions generally require that Comcast receive the benefit of whatever rights a programmer may grant to other distributors. These MFNs can be read to require a programmer to offer Comcast access to the same online distribution rights, if any, that the programmer offers to another MVPD. The provisions that briefly address online rights are generally standard “boilerplate.” Comcast has used online content pursuant to these MFN and boilerplate online rights provisions for only {{

}} A list of affiliation agreements containing MFN or boilerplate online rights provisions is provided in Excel spreadsheet format as Exhibit 20.2, which is included on the enclosed compact disc labeled “Comcast Exhibits.” Examples of agreements with such provisions are being produced herewith. Per discussions with Commission staff, a list of affiliation agreements from certain programmers containing MFN or boilerplate online rights provisions, as well as examples of such provisions, are being produced herewith.

- 21. Provide all agreements currently in effect and all agreements executed since January 1, 2006 between the Company and any other Person that grant online video distribution rights for the Company’s Video Programming.**

Any responsive documents have been produced herewith.

- 22. Describe in detail all discussions, deliberations, analyses, and decisions related to providing or not providing the Company’s Video Programming to unaffiliated Online Video Programming Distributors, including but not limited to Hulu, Boxee, YouTube, Amazon, and iTunes. Identify all Persons, including their respective positions and organization, involved in such decisions, deliberations, analyses, or discussions.**

**I. National and Regional Non-Sports Networks**

**A. Authenticated Services.**

As this platform is still an emerging technology, Comcast’s current strategy for entering into authenticated service distribution agreements with MVPDs is to provide content on a test basis with relatively short terms and renewal periods. Comcast’s strategy for online

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<sup>12</sup> Pursuant to discussions with the Commission staff, Comcast's response is limited to the video programmers listed in Appendix E.

streaming has always been to limit distribution to short-form content, except for distribution to authenticated MVPD subscribers. For instance, distribution to any ad-supported streaming service on an unauthenticated basis will include only short-form content. Since authenticated services by definition only make content available to linear service subscribers, long-form content is distributed in this manner, and an analysis of delivery requirements, programming, security, and advertising strategy must be undertaken on a case-by-case basis.

All of these negotiations take place with current linear distribution partners. Assuming a Comcast network possesses all of the necessary rights to provide Online Video Programming to OVPDs in the first place, the key points that determine whether or not a deal can be completed with such distributors include: []

{} The major technical limitation in this category is the lack of ability to measure accurately audience and “ratings.” Currently, there is no reliable way to include authenticated views into Nielsen ratings numbers.

The chart below provides some examples of some of the agreements and ongoing negotiations between various Comcast networks and providers of online authentication services.

Service	Distributor	Type of Platform	Key terms at issue	Agreement reached?	Notes

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Service	Distributor	Type of Platform	Key terms at Issue	Agreement reached?	Notes

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