

July 20, 2010

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
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 Ms. Dortch:

On July 19, 2010, Larry Hunter, Susan Eid, Stacy Fuller, and undersigned counsel on behalf of DIRECTV discussed the above referenced transaction with Bill Lake, Jessica Almond, Dana Scherer, Julie Salovaara, Deborah Broderson, William Beckwith, Jennifer Tatel, Bill Freedman, Marcia Glauberman, Daniel Shiman, and Betsy McIntyre of the Media Bureau; John Flynn, Jim Bird, Joel Rabinovitz, and Neil Dellar of the Office of General Counsel; Chuck Needy and Paul LaFontaine of the Office of Strategic Planning and Policy Analysis; and Stacy Jordan of the Wireless Telecommunications Bureau. During this meeting, the DIRECTV representatives generally reviewed and elaborated upon the comments filed on behalf of the company in this proceeding.

In particular, they focused on the need to require arbitration to resolve disputes involving two types of programming that would be controlled by Comcast/NBCU: retransmission consent for broadcast stations and carriage of national programming networks. They discussed the nature of “must have” programming, and the potential effect of the combined programming assets of Comcast/NBCU in this regard. They highlighted certain benefits of having an arbitration remedy, such as the relief it provides against demands for carriage of less desirable programming and the fact that it forces parties toward market-based offers. They also discussed the need for streamlining the arbitration process in the manner suggested in DIRECTV’s comments, and explored the possibility of having such matters handled by an Administrative Law Judge rather than a commercial arbitrator.

The DIRECTV representatives also discussed online content, and their request to extend well-established program access principles developed for linear programming to this new context in order to safeguard competition. They discussed the still-evolving nature of the online market, and explained that the proposed condition was drawn broadly in order to cast as wide a net as possible for emerging content delivery platforms. In response to a question from the staff, they

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agreed that the condition as drafted relates only to multichannel video programming distributors (“MVPDs”) and does not address the question of whether purely online content providers fall into that category – an issue currently pending before the Commission.

Should you have any questions about this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/

William M. Wiltshire
Counsel for DIRECTV

cc: Bill Lake
Jessica Almond
Dana Scherer
Julie Salovaara
Deborah Broderson
William Beckwith
Jennifer Tatel
Bill Freedman
Marcia Glauberman
Daniel Shiman
Betsy McIntyre
John Flynn
Jim Bird
Joel Rabinovitz
Neil Dellar
Chuck Needy
Paul LaFontaine
Stacy Jordan