

August 13, 2010

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, DC 20554

Re: *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses*,
MB Docket No. 10-56

Dear Ms. Dortch:

In their July 20, 2010, economic report, Drs. Israel and Katz presented a regression analysis based on Professor Austan Goolsbee's proposed test for whether an MVPD's network carriage decisions represent anti-competitive foreclosure.¹ Drs. Israel and Katz have informed me that they have discovered an error in the coding used in their statistical analysis and that correcting this error changes their numerical results but not their fundamental finding that application of Professor Goolsbee's test to Comcast's behavior supports the conclusion that the incentives to engage in anti-competitive foreclosure are insignificant. Specifically, the corrected results establish that – contrary to what the Goolsbee test indicates would be expected in the presence of anti-competitive incentives – there is not a robust, stable relationship between rival MVPDs' share in a DMA and Comcast's carriage rate of its own networks.

Drs. Israel and Katz have provided the following table, which presents the corrected versions of the results reported in Table VI.1 of their report, referenced in Footnote 191 of that report, and provided in the backup materials provided with that report.

¹ Mark Israel and Michael L. Katz, Economic Analysis of the Proposed Comcast-NBCU-GE Transaction, *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses*, MB Docket No. 10-56, July 20, 2010, at ¶ 144-146 and Table VI.1.

	Logit (weighted)	Logit (un-weighted)
Comcast	1.46278** (0.27577)	0.29279* (0.12267)
Comcast X DBS_Telco_Share	-0.01947* (0.00788)	0.00617 (0.00379)
DBS_Telco_Share	0.00405 (0.00858)	0.00469 (0.00314)
Number of networks carried	0.04274** (0.00298)	0.05565** (0.00357)
Percent Hispanic	-0.01023 (0.00542)	0.00148 (0.00246)
Percent Black	-0.00401 (0.00453)	-0.00030 (0.00228)
Percent under 18 years	-0.00537 (0.01899)	-0.01385 (0.00806)
Percent over 65 years	-0.02078 (0.01286)	-0.01324* (0.00592)
log (median household income)	-0.02884 (0.24945)	-0.04275 (0.09866)
Population per household	-0.00095 (0.00278)	-0.00269* (0.00111)
Percent of homes owned	0.00121 (0.00442)	0.00445 (0.00249)

Robust standard errors in parentheses

** p<0.01, * p<0.05

In addition, I am filing by hand a version of a corrected Stata program (data_build.do), which should replace the program with the identical name provided in the earlier backup materials. The underlying, raw data provided in the earlier backup materials remain unchanged.

Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

/s/ Michael H. Hammer

Michael H. Hammer

Counsel for Comcast Corporation

cc: Jessica Almond
Vanessa Lemmé

CERTIFICATE OF SERVICE

I, Ann Staron, hereby certify that on this 13th day of August, 2010, I caused true and correct copies of Comcast's Ex Parte updating certain data in the Israel/Katz July 20th economic report to be served by first class mail to:

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