

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,

On August 12, 2010, representatives of Comcast Corporation had two meetings with FCC staff relating to the above-captioned proceeding. Comcast was represented at the meetings by Matt Bond, Executive Vice President of Content Acquisition, David Juliano, Executive Vice President, Marketing and Product Development, and Tony Werner, Executive Vice President and Chief Technology Officer, all of Comcast Cable; Matthew Fradin, Jordan Goldstein, and Kathryn Zachem, all of Comcast Corporation; Arthur Burke of Davis Polk & Wardwell LLP; and James Casserly, Michael Hammer, and Mary Underwood of Willkie Farr & Gallagher LLP (collectively, "Comcast").

The first meeting included the following Commission staff: Jessica Almond, William Beckwith, James Bird, Deborah Broderson, Mark Bykowsky, Paul DeSa, John Flynn, Marcia Glauberman, Jamila-Bess Johnson, Stacy Jordan, Paul LaFontaine, Nicole McGinnis, Erin McGrath, Elizabeth McIntyre, Virginia Metallo, Chuck Needy, Joel Rabinovitz, Dana Scherer, and Jennifer Tatel. Paul Gallagher from the Department of Justice also attended the meeting. The second meeting included the following Commission staff: Jessica Almond, William Beckwith, James Bird, Deborah Broderson, Mark Bykowsky, Paul DeSa, John Flynn, Marcia Glauberman, Jamila-Bess Johnson, Paul LaFontaine, Nicole McGinnis, Erin McGrath, Virginia Metallo, Chuck Needy, Alison Neplokh, Joel Rabinovitz, Dana Scherer, and Jennifer Tatel. Justin Hurwitz from the Department of Justice also attended the meeting.

In the first meeting, Comcast presented an overview of its video products business, particularly its cable tiers, HD channels, video-on-demand, set-top boxes, and DVR service, though Comcast's High-Speed Internet service was also briefly discussed. The discussion focused on the intense competition Comcast faces and how that is driving Comcast to maximize the choices and flexibility that it offers to consumers. Comcast also presented an overview of how it obtains video content and answered questions from Commission staff about its business.

In response to a staff question, Comcast explained that specific channel placement is rarely the subject of program carriage negotiations or contracts. Changing channel line-ups is very difficult. In the case of an established cable operator (unlike a national DBS provider or new wireline entrant), some channels secured their channel positions years ago, and the channels in the same "neighborhood" have long been assigned to other networks. Today, relatively new channels of similar genres cannot easily be placed in the same neighborhood due to the existing and long-standing channel assignments. The situation is further complicated by the fact that there can be multiple channel line-ups even in a single metropolitan area, and they may reflect different system capacities, PEG obligations, and must-carry channels. Thus, reassigning one channel commonly requires reassigning multiple others as well, with each such change generating consumer confusion and dissatisfaction. Comcast also explained that the relevance of channel assignments is diminishing as the number of program choices increases and the search functions of program guides improve. Comcast's goal is to make it easy for its customers to find the programming they want, whether affiliated or unaffiliated (and the vast majority of the choices Comcast offers are and will continue to be unaffiliated).

In the second meeting, Comcast discussed its investment and innovation in broadband Internet, and also reviewed the respective roles of Fancast and Xfinity TV. In response to a staff question, Comcast explained that looking solely at the number of 6-MHz channels allocated to Comcast's High-Speed Internet ("HSI") on a cable system does not accurately portray the full extent of the resources that Comcast makes available for Internet use, or the ways in which it increases capacity as customer traffic grows. In contrast to a video channel that may be "broadcast" to tens of thousands of homes, only a few hundred homes share the bandwidth created by allocating channels to HSI service. As with frequency reuse in the context of cellular radio, those channels are reused over and over again by other groups of homes across the cable system, so the effective capacity is vastly greater than if those channels were being shared in the same way that the broadcast video channels are.

While more channels can be and have been allocated to HSI (typically three or four downstream channels are now used in a system where DOCSIS 3.0 has been deployed), often, the most expedient and efficient means to increase the overall bandwidth available to customers in an area is to reduce the number of customers sharing that bandwidth. Comcast constantly monitors traffic levels and, when usage on a particular node requires it, splits the node, thereby doubling the effective capacity for the affected homes and ensuring that Comcast HSI customers continue to enjoy a superior Internet experience. Validating that approach, Ookla, a company that specializes in broadband speed testing, recently reported that Comcast is "the top residential ISP in the U.S. based on download speed performance."

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Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

/s/ Michael H. Hammer  
Michael H. Hammer

cc:	Jessica Almond	William Beckwith	James Bird	Deborah Broderson
	Mark Bykowsky	Paul DeSa	John Flynn	Marcia Glauberman
	Jamila Bess Johnson	Stacy Jordan	Paul LaFontaine	Nicole McGinnis
	Erin McGrath	Elizabeth McIntyre	Virginia Metallo	Chuck Needy
	Alison Neplokh	Joel Rabinovitz	Dana Scherer	Jennifer Tatel