

August 18, 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 Licensees*, MB Docket No. 10-56, Summary of Ex Parte Meeting

Dear Ms. Dortch,

On August 17, 2010, Marc Graboff, Co-Chairman, NBC Entertainment and Universal Media Studios; John Wallace, President, NBC Local Media; Beth Roberts, Executive Vice President Cable Entertainment Business Affairs, Digital and New Business Development; Richard Cotton, Executive Vice President and General Counsel, NBC Universal, Inc.; Margaret Tobey, Vice President, Regulatory Affairs, NBC Universal, Inc (collectively "NBCU"); Richard Metzger, Lawler, Metzger, Keeney & Logan, LLC, counsel to General Electric Company; and the undersigned, counsel to NBCU, met with the following Commission staff regarding issues relating to the NBC broadcast television network, the NBC-affiliated owned and operated television stations and its cable entertainment networks in connection with the above-captioned proceeding: Jessica Almond; Deborah Broderson; Mark Bykowsky; Paul de Sa; Neil Dellar; John Flynn; William Freedman; Marcia Glauberman; Jamila-Bess Johnson; Erin McGrath; Betsy McIntyre; Virginia Metallo; Dana Scherer; and Jennifer Tatel. Joseph Pinto from the Department of Justice also attended the meeting.

The NBCU executives discussed three segments of NBCU's business: the NBC broadcast television network, NBCU's cable entertainment networks and the NBC-affiliated owned and operated television stations. Mr. Graboff explained how the rights to exhibit entertainment programming are acquired for the NBC network and how dramatic changes in television viewing over the last 10 to 15 years – including audience fragmentation and time-shifting – have caused broadcast advertising revenues to decline, while program acquisition and production costs have continued to rise. Mr. Graboff also explained that the traditional "windows" for exhibiting network programming and for recouping production and acquisition costs (i.e., first-run and summer repeats on the network and eventual syndication by the

Marlene H. Dortch

August 18, 2010

Page 2

production studio for the very few shows that succeed) are also being adversely affected by these changes in viewing patterns. As a result, the single-revenue stream model traditionally relied on by broadcasters is facing serious challenges. Mr. Graboff emphasized the importance of developing a second revenue stream (particularly through retransmission consent fees) in order to maintain the high-quality programming viewers expect and, ultimately, the viability of television broadcasting.

Ms. Roberts explained how the rights to exhibit entertainment programming are acquired for NBCU's cable networks and how the dual revenue stream model for such subscription programming results in a successful and viable business model that supports continued investment in expensive, high production-value programming, which increasingly includes original programming. Mr. Wallace discussed the operation of the NBC-affiliated owned and operated stations and explained that the broadcast network/affiliate model represents an effective mechanism for distributing programming nationwide and for meeting the needs of viewers for timely and relevant local information and news. Mr. Wallace also emphasized that the stations have a strong commitment to journalism and must develop additional sources of revenue, including retransmission consent fees, to continue the production of expensive local news programming. Finally, the NBCU executives highlighted that major benefits of the proposed transaction include Comcast's commitment to invest in programming and to maintain the NBC broadcast network as a premier entertainment programming service.

Sincerely,

/s/ Kenneth E. Satten

Kenneth E. Satten

cc: Jessica Almond, Deborah Broderson, Mark Bykowsky, Paul de Sa, Neil Dellar, John Flynn, William Freedman, Marcia Glauber, Jamila-Bess Johnson, Erin McGrath; Betsy McIntyre, Virginia Metallo, Dana Scherer, Jennifer Tattel