



Comcast Corporation
2001 Pennsylvania Ave., NW
Suite 500
Washington, DC 20006
202.379.7100 Tel
202.466.7718 Fax
www.comcast.com

October 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

Dear Ms. Dortch:

On October 15, 2010, the undersigned of Comcast Corporation met with William Freedman and Jennifer Tatel of the Media Bureau. We reviewed the attached chart of select issues raised in the above-captioned proceeding and the chart attached to Applicants' August 19 Reply to Responses.¹

Kindly direct any questions regarding this matter to my attention.

Respectfully submitted,

/s/ Kathryn A. Zachem
Kathryn A. Zachem
Vice President, Regulatory and State Legislative Affairs

cc: William Freedman
Jennifer Tatel

¹ Comcast Corporation, General Electric Company, and NBC Universal, Inc., Reply to Responses, MB Docket No. 10-56 (Aug. 19, 2010).

SELECT ISSUES AND RECORD CITES TO APPLICANTS' FILINGS

Subject / Issue	Primary Parties Raising Subject / Issue¹	Record Cites to Applicants' Filings
Description of the Parties	N/A	Public Interest Statement at 16-33.
Description of the Transaction	N/A	Public Interest Statement at 11-16, Apps. 1-4.
Standard of Review	CFA <i>et al.</i>	Public Interest Statement at 33-35; Opposition & Response at 9-16.
Benefits of the Transaction <ul style="list-style-type: none"> • Preserve and strengthen free over-the-air broadcasting • Expand the amount, quality, and diversity of national and local programming • Accelerate investment in and deployment of innovative products and services through: <ul style="list-style-type: none"> ○ Reduction in transactional friction 	CFA <i>et al.</i> ; DirecTV; FACT Coalition Bloomberg; CFA <i>et al.</i> ; Entertainment Studios; NCAAOM; WGAW AAI; DirecTV; WGAW AAI; DirecTV	Public Interest Statement at 39-42, Appendix 8 (Commitment #1); Opposition & Response at 18-25; Rosston Benefits Report ¶¶ 10-14; Rosston/Topper Reply Report ¶¶ 14-20; NBC Affiliates Agreement; Non-NBC Affiliates Associations Agreement. Public Interest Statement at 36-54, Appendix 8 (Commitments ## 2, 3, 6, 7, 8, 9); Opposition & Response at 25-52; Rosston Benefits Report ¶¶ 8, 10-14; Rosston/Topper Reply Report ¶¶ 14-19. Public Interest Statement at 54-61; Rosston Benefits Report ¶¶ 56-70; Opposition & Response at 56-59; Rosston/Topper Reply Report ¶¶ 6-13. Public Interest Statement at 61-66; Rosston Benefits Report ¶¶ 15-50, 56-67; Opposition & Response at 59-65; Rosston/Topper Reply Report ¶¶ 6-13.

¹ This column only refers to commenters/petitioners who raised criticisms in the proceeding and does not include commenters who supported Applicants' positions. The full names of commenters/petitioners that are abbreviated or identified by acronyms in this column are provided in the Appendix.

Subject / Issue	Primary Parties Raising Subject / Issue ¹	Record Cites to Applicants' Filings
<ul style="list-style-type: none"> ○ Change in corporate control • Stimulate competition • Support and serve the interests of local communities • Other efficiencies, cost savings, and synergies <ul style="list-style-type: none"> ○ Sharing of advertising resources ○ Cross-promotion 	<p>WGAW</p> <p>ACA; CFA <i>et al.</i>; DirecTV; Dish Network</p> <p>CFA <i>et al.</i>; DirecTV; Greenlining Institute</p> <p>N/A</p> <p>CFA <i>et al.</i>; Senator Kohl</p> <p>N/A</p>	<p>Rosston Benefits Report ¶¶ 51-55; Opposition & Response at 66-67.</p> <p>Public Interest Statement at 5, 37-38, 55-61; Rosston Benefits Report ¶¶ 8, 69-70; Opposition & Response at 76-79.</p> <p>Public Interest Statement at 39-42, 67-70, Appendix 8 (Commitments ## 2, 11, 12); Comcast Response to Information Request Nos. 61-62; Opposition & Response at 50-56, 307-11.</p> <p>Public Interest Statement at 70-71.</p> <p>Rosston Benefits Report ¶¶ 44-47, 71, 76-77; Opposition & Response at 73-76; Rosston/Topper Reply Report ¶¶ 85-86.</p> <p>Public Interest Statement at 66; Rosston Benefits Report ¶¶ 78-79.</p>
<p>Compliance with Ownership Rules</p> <ul style="list-style-type: none"> • Channel occupancy limit • Cross-ownership and multiple ownership rules <ul style="list-style-type: none"> ○ Divestiture trust of KWHY-TV in Los Angeles 	<p>N/A</p> <p>N/A</p> <p>Rita Guajardo Lepicier</p>	<p>Public Interest Statement at 75-77; Comcast Response to Information Request No. 14.</p> <p>Public Interest Statement at 71-75.</p> <p>Public Interest Statement at 73-74; Applicants' May 17, 2010 Ex Parte Letter; NBCU Response to Information Request No. 58.</p>

Subject / Issue	Primary Parties Raising Subject / Issue ¹	Record Cites to Applicants' Filings
<ul style="list-style-type: none"> ○ KXAS-TV amendment ○ Cable-broadcast cross-ownership 	<p>N/A</p> <p>N/A</p>	<p>Public Interest Statement at 74-75; NBCU Response to Information Request No. 59.</p> <p>Public Interest Statement at 71-72.</p>
Advertising Competition	AOL; Bloomberg; CFA <i>et al.</i> ; Dish Network; Greenlining Institute; Senator Kohl	Public Interest Statement at 8, 82 n.163; Rosston Benefits Report ¶¶ 44-47, 76-77; Responses to Several Members of Congress at 23-24; Opposition & Response at 73-76; 120-128; Rosston/Topper Reply Report ¶¶ 41-86; Comcast's August 20, 2010 Ex Parte Notice Letter.
Applicants' Qualifications for License Transfer <ul style="list-style-type: none"> • Character issues • Diversity • Localism 	<p>CFA <i>et al.</i>; Morality in Media; PTC; Senator Franken</p> <p>Black Economic Council; CFA <i>et al.</i>; Greenlining Institute; CWA; Economic Business Development; Korean Churches for Community Development; Latino Business Chamber of Greater Los Angeles; Rep. Maxine Waters <i>et al.</i>; NABOB</p> <p>Black Economic Council; CFA <i>et al.</i>; Greenlining Institute; CWA; Economic Business Development; Korean Churches for Community Development; Latino Business Chamber of Greater Los Angeles</p>	<p>Opposition & Response at 270-76.</p> <p>Opposition & Response at 228-62.</p> <p>Opposition & Response at 262-70.</p>

Subject / Issue	Primary Parties Raising Subject / Issue ¹	Record Cites to Applicants' Filings
Labor Issues	CWA	Public Interest Statement at 38 n.69; Responses to Several Members of Congress at 26-29; Opposition & Response at 285-92.
Accessibility to Technology for Disabled Persons	COAT	Opposition & Response at 292-94; Hispanic MOU at 3-6.
Cable Prices	CFA <i>et al.</i> ; Dish Network; Senator Franken	Public Interest Statement at 8; Responses to Several Members of Congress at 25-26; Opposition & Response at 295-297.
Franchise Issues <ul style="list-style-type: none"> • Equipment fees • Michigan Franchising Rules • Wilmington, DE Franchise Agreement 	City of Seattle <i>et al.</i> City of Detroit, MI LAPA	Opposition & Response at 297-303. Opposition & Response at 303-06. Reply to Responses at 27-29.
Public, Educational, and Governmental Programming	ACD; GMTC; NATOA	Public Interest Statement at 67-70, Appendix 8 (Commitments ## 11, 12); Opposition & Response at 53-56, 307-11; Comcast Response to Information Request Nos. 61-62.
Piracy and Copyright Enforcement	CFA <i>et al.</i>	Opposition & Response at 311-13.
Portland Trail Blazers Contractual Issues	Portland Trail Blazers	Opposition & Response at 14, 313-16.
Property Damage Claims	Elan Feldman	Opposition & Response at 316-17.

APPENDIX

Acronym/Abbreviated Cite	Party
AAI	American Antitrust Institute
ACA	American Cable Association
ACD	Alliance for Communications Democracy
City of Seattle <i>et al.</i>	Cities of Seattle, Tacoma, Renton, Maple Valley, Des Moines, University Place, Longview, Issaquah, Spokane, Kirkland, and Milton, Washington, Cities of Minneapolis, Bloomington, and Coon Rapids, Minnesota, City of Springfield, Oregon, the Metropolitan Area Communications Commission, the Rainier Communications Commission, the Ramsey/Washington Counties Suburban Cable Communications Commission II, the North Metro Telecommunications Commission, and the South Washington County Telecommunications Commission.
CFA <i>et al.</i>	Free Press, Media Access Project, Consumer Federation of America and Consumers Union
COAT	Coalition of Organizations for Accessible Technology
CWA	Communications Workers of America
FACT Coalition	Fair Access to Content & Telecommunications Coalition, National Telecommunications Cooperative Association, Western Telecommunications Alliance
GMTC	Greater Metro Telecommunications Consortium
LAPA	Leased Access Producers Association
NABOB	National Association of Black Owned Broadcasters
NATOA	National Association of Telecommunications Officers and Advisors
PTC	Parents Television Council, American Family Association, Focus on the Family, Citizens for Community Values, Reclaim our Culture Kentuckiana & Coalition for Marriage and Family
WGAW	Writers Guild of America, West