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**Barbara S. Esbin**  
Admitted in the District of Columbia

November 18, 2010

**Via ECFS**

Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Room TW-A325  
Washington, DC 20554

**Re: American Cable Association (“ACA”) Notice of Ex Parte Presentation; *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 November 17, 2010, Matthew Polka and Ross Lieberman, American Cable Association; William Rogerson, Northwestern University; Tom Cohen, Kelley Drye & Warren LLP; and the undersigned participated in a telephone conference with John Flynn, Senior Counsel to the Chairman for Transactions and Michael Steffen, Office of General Counsel. In the meeting, participants discussed the safeguards ACA has proposed to protect consumers and competition from the horizontal and vertical harms described in ACA’s Reply filed August 19, 2010 in the above-referenced proceeding.<sup>1</sup>

Participants again discussed the need for effective relief from the higher programming fees that Comcast-NBCU will be able to extract from multichannel video programming distributors (MVPDs) of all sizes as a result of the transaction. In particular, participants discussed how best to fashion relief for smaller MVPDs serving 125,000 or fewer subscribers for NBC broadcast station and Comcast regional sports network (“RSN”) programming in a particular region or Designated Market Area, consistent with ACA’s previous filings in this docket. Participants also discussed means of empowering bargaining agents to bargain collectively on behalf of small MVPDs for NBCU national cable programming networks, consistent with the recommendations contained in ACA’s previous filings in this docket.

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<sup>1</sup> *In the Matter of Applications of Comcast Corporation, General Electric Company, and NBC Universal, Inc., to Assign and Transfer Control of FCC Licenses*, MB Docket No. 10-56, Reply of the American Cable Association (filed Aug. 19, 2010) (“ACA Reply”). In addition ACA’s concerns and recommended conditions are documented in ex parte letters filed on August 27, 2010, September 21, 2010, September 22, 2010, October 12, 2010, October 29, 2010, November 4, 2010, November 8, 2010, and November 15, 2010.

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If you have any questions, or require further information, please do not hesitate to contact me directly. Pursuant to section 1.1206 of the Commission's rules, this letter is being filed electronically with the Commission.

Sincerely,



Barbara S. Esbin

cc (*via email*): John Flynn  
Michael Steffen