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December 3, 2010

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**Re: *Ex Parte* Notice: Applications of Comcast Corporation,  
General Electric Company and NBC Universal, Inc. For  
Consent to Assign Licenses or Transfer Control of Licensees,  
MB Docket 10-56**

Dear Ms. Dortch:

In compliance with Section 1.1206(b) of the Commission's rules, the undersigned submits this *ex parte* notice relating to the above-captioned proceeding.

On December 2, 2010, Frederick J. Ryan, Jr., President of Allbritton Communications Company, and the undersigned along with Edward Fritts and Kenneth Inouye of the Fritts Group met with members of Commissioner Clyburn's staff including: David Grimaldi, Chief of Staff and Media Advisor, Angela Kronenberg, Wireline Legal Advisor and Louis Peraertz, Wireline, Public Safety and International Legal Advisor, to discuss the proposed acquisition of NBCU by Comcast.

In the meeting, we discussed the potentially grave implications for NewsChannel 8, Allbritton's locally-owned, independent cable news channel, if the acquisition is permitted to close absent conditions that would protect the existence of NewsChannel 8 and similarly situated channels in direct, horizontal competition with NBCU's owned and operated stations. Although Comcast has indicated it will negotiate for the renewed carriage of NewsChannel 8, its instance on "packaging" the local cable news channel with broadcast retransmission consent for stations in far-off markets both ignores the independent value of NewsChannel 8 and, more fundamentally, exposes Comcast's true intention to devalue the news channel, rendering it financially non-viable.

The effect of such action now and importantly post-merger would inure directly to the benefit of the NBCU owned and operated station, WRC-TV. With the extensive array of NBCU's programming content combined with unprecedented control over distribution facilities, Comcast will have both the ability and incentive to eliminate NewsChannel 8 as a competitive threat. The result would be the loss of

a separate, locally-owned, independent voice in the market. Absent a condition that either (1) forces divestiture of owned and operated stations in markets where Comcast has greater than 30% control of the distribution or (2) requires Comcast to negotiate non-discriminatory carriage at marketplace rates using the current subscriber fee as a fair indication of those rates, there is no protection against the combined Comcast/WRC-TV entity.

Reference was also made to the implications on the advertising marketplace in Washington with Comcast's Spotlight organization providing sales services for its systems along with those owned by Cox and Verizon FiOs and then combining with the sales for of WRC-TV. The consolidated entity would control post-acquisition in excess of 40% of the television advertising revenue in the market with the ability to substantially affect that market to the detriment of both competitors and advertisers.

The Commission was encouraged to consider the potential implications of non-conditioned approval and urged to delay the proceeding until such time as the implications are fully vetted. A summary of the points made at the meeting is attached and was provided to the Commissioner's staff.

In accordance with the Commission's rules this *ex parte* notice is being filed electronically in the above-referenced docket. Please contact the undersigned should you have any questions regarding this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerald N. Fritz", with a large, sweeping flourish extending to the left.

Jerald N. Fritz  
Senior Vice President,  
Legal and Strategic Affairs

Attachment

cc: Mr. David Grimaldi  
Ms. Angela Kronenberg  
Mr. Louis Peraertz