



CONNECTING HOMETOWN AMERICA

Ross J. Lieberman
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December 13, 2010

Via ECFS

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

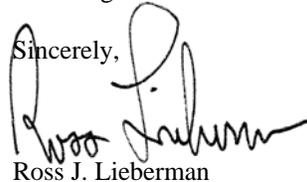
Re: American Cable Association (“ACA”) Notice of Ex Parte Presentation; *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses or Transfer Control of Licenses*; MB Docket No. 10-56.

Dear Ms. Dortch:

On December 10, 2010, the undersigned participated in a telephone conference with John Flynn, Senior Counsel to the Chairman for Transactions and Michael Steffen, Office of General Counsel. During the conference, I discussed the safeguards ACA has proposed to protect consumers and competition from the horizontal and vertical harms consistent with ACA’s previous filings in the above-referenced proceeding.¹

Once again, I stressed the need for the Commission to impose conditions that would prohibit Comcast-NBCU from charging smaller MVPDs more than clear, market-based rates for “must have” programming together with a simplified enforcement mechanism that can provide certain relief when commercial negotiations fail to produce satisfactory outcomes for smaller MVPDs. Participants discussed how best to provide 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, particularly 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.

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,

Ross J. Lieberman

cc (via email): John Flynn
Michael Steffen

¹ *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, November 15, 2010, November 17, 2010, November 24, 2010, December 7, 2010 and December 8, 2010.