

January 10, 2011

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 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:

Since the day Comcast Corporation (“Comcast”) and General Electric Company announced their proposed joint venture regarding NBC Universal (“NBCU”) (collectively, “Applicants”) over 13 months ago, we have made clear that we would use the combined assets of Comcast and NBCU to better meet the entertainment, communications, and information needs of the American public. Accordingly, when we filed our Applications and Public Interest Statement in January 2010, we included 16 specific commitments detailing the ways in which Comcast and the new NBCU would deliver concrete public interest benefits by, among other things, enriching the output of local news, local public affairs, and other public interest programming; increasing diverse programming; advancing the educational and informational needs of children; and protecting and expanding the availability of public, educational, and governmental (“PEG”) programming. In subsequent months, we have reached, and reported on, several agreements that provide assurances of further public benefits in connection with this transaction. Now, as a product of continued dialogue with interested stakeholders and with Commission staff, Applicants describe herein further amplification of our initial commitments that builds on the opportunities this transaction makes possible and further substantiates the public interest benefits of this joint venture.

Local News on Telemundo. Local news, local public affairs, and other public interest programming have been a major focus of Applicants from the outset. In the Public Interest Statement, Applicants committed to preserve and enrich the output of local news and other public affairs programming (Commitment #2). Applicants further committed that the NBC owned-and-operated (“O&O”) stations would collectively produce an additional 1,000 hours per year of local news and information programming. Subsequently, as part of a Memorandum of Understanding reached with Hispanic Leadership Organizations, Comcast and NBCU agreed to

“consider expanding local Telemundo newscasts” and “to expand local content in Telemundo station newscasts.” To this end, Applicants now commit that for three years following a twelve-month implementation period, NBCU’s Telemundo O&O station group will collectively produce an additional 1,000 hours of local news and information programming that will air on the primary channel of six Telemundo O&O stations.

Meeting the Needs of Parents and Children. In the Public Interest Statement, Comcast and NBCU committed to increase the availability of diverse programming and programming for children and families (Commitment #3). In addition, we offered commitments to improve the tools for parents to monitor and control their children’s viewing (Commitment #4).

Applicants now undertake to add to these benefits. First, Applicants previously committed to provide one additional hour per week (above the current three-hour requirement) of children’s educational and informational programming utilizing one of the multicast channels of NBC’s O&O stations for three years. We now commit that, for three years after closing the transaction, we will also provide one additional hour per week (beyond the three-hour requirement) of children’s educational and informational programming on the primary channel of each Telemundo O&O station.

In addition, as an industry leader in providing parental control tools, Comcast further commits that, for existing legacy digital set-top boxes, Comcast will fully deploy improved parental control navigation (*e.g.*, the ability to access parental controls from multiple areas in the guide and service) and advanced filtering technologies (*e.g.*, “Lock By Content Type”) by the end of 2011. For Comcast’s tru2way guide, which should be available in substantially all of Comcast’s systems by the end of 2013, Comcast commits to develop and deploy a “parental dashboard” feature that puts all parental control settings in one place and enables parents to search for programming based on ratings from one or more third-party sources. And, for future IP-based Comcast-owned advanced set-top boxes, Comcast commits to enable parents, within one year after those boxes become commercially available, to restrict access to video programming based on ratings from one or more third-party sources and to restrict access to “widgets/interactive apps” offered through such boxes. Within two years after these boxes become commercially available, Comcast commits to create a child-centric restricted area that enables parents to affirmatively find and limit their children’s access to only parent-approved content based on TV, MPAA, or ratings from one or more third-party sources.

Interactive Advertising. To further underscore Applicants’ commitment to children, Comcast and NBCU commit to limit interactive advertising to children. In particular, as programmers, insofar as they control the advertising accepted within the programming, Comcast and NBCU will not insert interactive advertising into broadcast programming, or into the feed as delivered to MVPD linear channels, for programs primarily targeted to an audience of children 12 years old and younger. And as an MVPD, insofar as it controls advertising pursuant to its affiliation agreements, Comcast will not insert interactive advertising into networks composed of programming generally targeted to an audience primarily consisting of children 12 and under (*e.g.*, Nickelodeon, Sprout, Disney). Interactive advertising for this purpose is advertising for commercial products that is primarily targeted to children 12 and under and includes:

interactive, overlap pop-up advertising; telescoping, long-form advertising (but does not include enabling the consumer to “telescope” to additional linear or on demand programs); voting or polling requests that promote a product or service or gain information about consumer commercial preferences; T-Commerce that enables a consumer to purchase advertised products using a remote; and branded, interactive gaming which promotes a product.

Public Service Announcements (“PSAs”). To expand further on our commitment to children and families, we will undertake a targeted public education campaign on issues of importance to parents and children. We will provide \$15 million per year, for five years, in PSAs on digital literacy, parental controls, FDA nutritional guidelines, and childhood obesity. The PSAs on digital literacy, parental controls, and FDA nutritional guidelines will run in programming that has a higher concentration than the median cable network (viewers per viewing household) of adults 25-54 with children under 18 in the household. For the PSAs on childhood obesity, one PSA will air during each hour of NBC’s core educational and informational programming on its primary video signal and an average of two PSAs per day will run on PBS Kids Sprout.

Public, Educational, and Governmental Channels. Recognizing the important role that PEG can serve in local communities, Comcast made commitments to enhance localism and strengthen PEG programming. In particular, Comcast committed to continue to provide PEG programming in an analog format until the system on which a given PEG channel is carried is converted to all-digital distribution unless the franchising authority otherwise agrees (Commitment #11), as well as a groundbreaking commitment to develop a platform to host PEG content on video on demand and online (Commitment #12). To further respond to concerns expressed by commenters in the record, we now commit that Comcast will not implement a change in the method of delivery of PEG channels that results in a material degradation of the signal quality or impairment of viewer reception of PEG channels, with the understanding that this commitment will not prohibit Comcast from implementing new technologies also utilized for commercial channels carried on the cable system (including, but not limited to, digitization, switched digital video, or state-of-the-art compression technologies). Comcast will also continue to meet applicable FCC signal quality standards when offering PEG channels on its cable systems and will continue to comply with closed captioning pass-through requirements.

Please contact us should you have any questions regarding this matter.

Respectfully submitted,

/s/ Rick Cotton

Rick Cotton
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NBC Universal, Inc.

/s/ Kathy Zachem

Kathy Zachem
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