



Comcast Corporation  
300 New Jersey Avenue, NW  
Suite 700  
Washington, DC 20001

January 16, 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:

On January 14, 2011, the undersigned met with Commissioner Mignon Clyburn; and Dave Grimaldi, Chief of Staff and Media Legal Advisor; Angie Kronenberg, Wireline Legal Advisor; and Louis Peraertz, Legal Advisor for Wireless, International, and Public Safety, all of Commissioner Clyburn's staff, regarding the above-captioned proceeding. Those discussions continued on January 15, 2011 with the same individuals via two conference calls, one of which also included David L. Cohen, Executive Vice President of Comcast Corporation ("Comcast"). We reviewed various commitments that Applicants have made in connection with the Commission's review of the transaction and, in the course of the discussion, provided the following clarifications and additional commitments:

*Carriage of independent programming.* Applicants have committed that Comcast will launch at least ten new independent programming channels over the next eight years. We have provided additional details about the timetable for launching independent channels that will be majority African American owned and others that will have Hispanic ownership and/or management. In our meeting, we emphasized that the numbers of networks we have specified and the timetables for launching them are floors, not ceilings; we hope to exceed these numbers and to beat these deadlines. The Commission can draw confidence in this regard from Comcast's strong record of carrying independent channels, which is reflected in the support that the transaction has received from multiple, diverse, independent programmers.

*Local news and information programming.* Applicants have committed that the NBC owned-and-operated ("O&O") stations will collectively produce an additional 1,000 hours per year of local news and information programming that will air either on the primary channel or a multicast channel that will reach at least 50% of homes in the station's DMA, and that NBCU's Telemundo O&O station group also will collectively produce an additional 1,000 hours per year

of local news and information programming that will air on the primary channel of at least six Telemundo O&O stations. We have said that this will consist of a range of local and regional content, including general interest news and public affairs programming, weather, traffic, and other informational programming. As we create additional hours of news and information programming for the NBC and Telemundo O&Os, and in order to promote diversity of viewpoint and programming, we will provide increased opportunities for participation by journalists and programming creators from the local communities for which we are creating such programming. And with respect to the number of Telemundo O&O stations that will air this additional local news and information programming, here too our commitment specifies a floor, not a ceiling. Further, with respect to our previous commitment not to reduce the amount of local news and information programming that NBC's O&Os currently provide, and our commitment to add the 1,000 hours per year, we confirmed our willingness to make those five-year commitments and to do the same regarding the no-reduction and 1,000-hour commitments for the Telemundo O&Os.

*Hyperlocalism partnerships.* Applicants have committed that at least half of the ten NBC O&Os will have in place cooperative arrangements with locally-focused, non-profit news organizations that provide reporting on issues relevant to each such station's market and/or region ("Online News Partners"). We confirmed that, in seeking out these cooperative arrangements, NBCU will undertake efforts to promote diversity of viewpoints and programming. In this regard, when soliciting proposals to meet its commitment, NBCU will inform potential Online News Partners 1) that we are committed to enhancing diversity of viewpoints and programming and 2) that diversity of backgrounds in individuals that comprise a potential Online News partner will be a relevant factor in determining if such partner can promote a diversity of voices.

*Ombudsman.* Given our desire to ensure full compliance with our voluntary commitments and stakeholder agreements, and anticipating that the Commission's approval of the transaction will be subject to conditions, Comcast plans, within 30 days of the Commission's approval, to designate an ombudsman for purposes of ensuring compliance with the memoranda of understanding, voluntary commitments, and the Commission's order/conditions. This will enhance the ability of interested parties to contact the company directly with any questions or concerns about these matters. We will post contact information for that individual on our website promptly after he or she is selected.

*Comcast Broadband Opportunity Program ("CBOP").* Last month, Comcast presented a plan to substantially increase broadband adoption in low-income homes throughout Comcast's service area by addressing three key barriers to adoption identified in the National Broadband Plan – reducing the cost of broadband access for low-income homes, the lack of a computing device in the home, and the absence of digital literacy. In connection with our CBOP commitment, we have now agreed to the following reporting obligation:

Comcast will submit an annual report to the Commission beginning on July 31, 2012 and for three years thereafter. That report will include a description of Comcast's compliance with its CBOP commitment. The report will identify the total number of households participating in CBOP, include an analysis of CBOP's effectiveness, and describe any adjustments Comcast plans to implement to

Ms. Marlene Dortch

January 16, 2011

Page 3 of 3

improve its effectiveness. Comcast will make this annual report available on its website.

Finally, as set forth in David Cohen's letter to Representative Bobby Rush of Illinois, and the attached Summary of Diversity Commitments (filed in this docket on July 12, 2010), we affirmed Comcast's commitment to establish external Diversity Advisory Councils to facilitate open communication on the development, monitoring, and evaluation of the company's diversity initiatives – with a particular focus by the Advisory Councils on five critical focus areas related to diversity, one of which is programming.

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

Respectfully submitted,

/s/ Kathy Zachem

Kathy Zachem

Vice President

Regulatory and State Legislative Affairs

cc: Hon. Mignon Clyburn  
Dave Grimaldi  
Angie Kronenberg  
Louis Peraertz