



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

July 28, 2011

FILED/ACCEPTED

JUL 28 2011

Federal Communications Commission  
Office of the Secretary

**VIA ELECTRONIC FILING**

Ms. 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 and Transfer Control of Licenses, MB Docket No. 10-56*

Dear Ms. Dortch:

In accordance with the Memorandum Opinion and Order adopted in the above-referenced proceeding,<sup>1</sup> Comcast Corporation, for itself and on behalf of NBCUniversal Media, LLC, hereby files the following reports:

- a. Semiannual progress report on NBCUniversal's efforts to reach cooperative arrangements with locally focused non-profit news organizations ("Online News Partners"). See Attachment A. The report is required by Section XI.5.f of Appendix A to the Comcast-NBCUniversal Order.
- b. Semiannual progress report on Comcast's development of the platform to host PEG [Public, Educational and Governmental] content on Video On Demand and Online ("PEG Pilot Program"). See Attachment B. The report is required by Section XIV.4.c.vii of Appendix A to the Comcast-NBCUniversal Order. A copy of this report will be posted today on [www.comcast.com/peg](http://www.comcast.com/peg).

Please do not hesitate to contact me should you have any questions.

<sup>1</sup> *In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses and Transfer Control of Licensees, Memorandum Opinion and Order, MB Docket No. 10-56, 26 FCC Rcd 4238 (2011) ("Comcast-NBCUniversal Order").*

No. of Copies rec'd 0  
List A B C D E

Ms. Marlene H. Dortch  
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Page 2

Sincerely yours,

Lynn R. Charytan

Lynn R. Charytan  
Vice President, Legal Regulatory Affairs  
Comcast Corporation

Enclosures

cc (by e-mail): Martha Heller  
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Deputy Chief, Investigations & Hearings Division  
Enforcement Bureau  
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cc (by hand delivery): Chief, Industry Analysis Division

# **ATTACHMENT A**



# NON-PROFIT ONLINE NEWS

Local non-profit online news organization for a very good reason NBC is looking for the opportunity to help out our communities (linking on to our website)  
LOCAL NON-PROFIT ONLINE ORGANIZATION FOR OUR COMMUNITIES

## PARTNERSHIPS



• possible arrangement  
issues  
concern or  
interest

to the communities of  
our local NBC stations.

NEW ORGANIZATION

### JULY 2011 PROGRESS REPORT

NBCUniversal

JULY 2011

# PROGRESS REPORT

This report summarizes the steps NBCUniversal has taken during the reporting period of **January 28 to July 28, 2011** to satisfy the obligation under Appendix A, Section XI.5 of the Comcast-NBCUniversal Order,<sup>1</sup> which requires at least half of the 10 NBC Owned Television Stations to enter into cooperative arrangements with locally focused non-profit news organizations (“Online News Partners”). As required, this report covers the first six months since the closing date of the Comcast-NBCUniversal transaction. Future reports will be filed every six months hereafter during the reporting period.

## BACKGROUND

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The Online News Partners condition was modeled on the existing relationship between NBC owned station KNSD in San Diego, and the Voice of San Diego, an independent, non-profit online news source focused on issues impacting the San Diego region. As in that arrangement, elements of the new news partnerships NBCUniversal will form may include story development, sharing of news footage and other content resources, financial support, in-kind contributions, shared use of technical facilities and personnel, on-air opportunities, promotional assistance and cross-linking/embedding of websites.

## SELECTION PROCESS

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### Establishment of the Advisory Council

Shortly after the closing of the Comcast-NBCUniversal transaction on January 28, 2011, NBCU established an advisory council to implement the Online News Partners program. The advisory council’s membership includes:

- News directors from all 10 of the NBC Owned Television Stations;
- Senior Vice President, Operations, NBC Owned Television Stations;
- Senior Vice President, NBC News;
- Vice President, Digital Media, NBC Owned Television Stations;
- Vice President, News Standards and Policies, NBC News;

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<sup>1</sup> Memorandum, Opinion and Order in the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. for Consent to Assign Licenses and Transfer Control of Licensees, MB Docket No. 10-56 (Jan. 18, 2011).



- Representatives of the NBCU Law Department, including the Vice President of Regulatory Affairs; and
- Senior Media Counsel.

The advisory council has met regularly via conference call beginning on March 1, 2011. The council was tasked with drafting a request for proposals and developing an evaluation process for assessing proposals. In addition, the council's duties included designing an outreach approach to ensure broad dissemination of information about the opportunity, establishing a timeline to ensure timely implementation, and preparing outreach materials.

At the initial meeting of the advisory council on March 1, it was determined that certain members would contact "subject matter experts" – organizations, such as ProPublica, Knight Foundation, McCormick Foundation and Poynter Institute, that support journalism, for assistance in identifying potential partners. These organizations were contacted between March and May 2011 and provided useful information and ideas to guide the outreach effort. The subject matter experts also recommended organizations who they thought could fit the profile of an Online News Partner. As a result, NBCU sent e-mails to the recommended organizations requesting that they consider applying for a news partnership.

At subsequent meetings in March and April 2011, a timeline was established, the review process was finalized, an evaluation "scorecard" was developed and the application form was finalized and approved. In addition, the advisory council adopted the selection criteria for the Online News Partnerships.

### **Request for Proposals (RFP)**

The advisory council developed an online application form (Exhibit A) for the Online News Partnerships which was included on the web page for each NBC Owned Television Station (except San Diego). The application page on the websites set forth the main criteria for online news partners, which are incorporated into the application itself:

- Robust local news gathering capabilities
- Track record of objectivity and excellence in journalism
- Strong journalistic qualifications
- Strong organizational management
- Strong financial resources capable of sustaining a multi-year relationship
- Ability to report on diverse stories and provide diverse viewpoints
- Diversity of the organization's leadership and staff and its ties to the community it serves
- Ability to work collegially in a cooperative relationship

The online application form seeks information about the following focus areas:

- I. **General Information About the Organization** – a description of the applicant’s involvement in local news gathering and reporting, including geographical area and topical focus.
- II. **Governance, Leadership and Structure** – information on the applicant’s governance, including its charter, bylaws, directors and officers. To further the goal of enhancing diversity of viewpoints and programming, the application form asks each applicant to describe the manner in which applicant’s governance and leadership reflects the diversity of communities in the station’s service area.
- III. **Newsgathering Capabilities** – a description of the applicant’s infrastructure for news gathering and news production, including editorial and non-editorial staff. Diversity of leadership and staff and the applicant’s ability to help the NBC Owned Television Stations enhance diversity of viewpoints and programming will be a factor in the review process.
- IV. **Funding and Resources** – information on the applicant’s funding sources for the last three years, including donations and grants, advertising policies and standards
- V. **Journalism Practices** – applicants must provide a copy of their written standards for the journalists who provide content used on their platforms.
- VI. **Audience Make-Up and Distribution of Content** – applicants must also describe the composition of their organization’s target audience, including average monthly page views and unique visitors and use of social media.

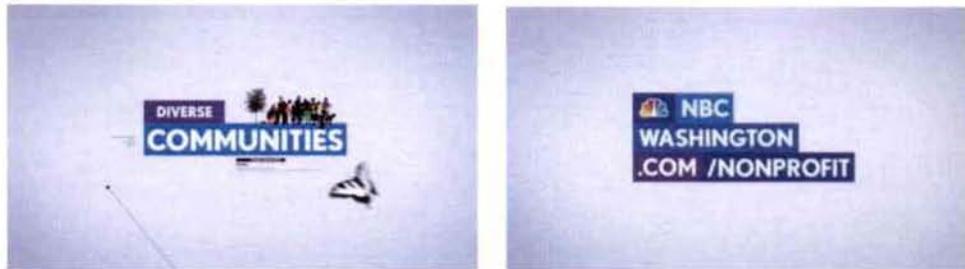
In addition, all applications must include a statement of interest and two letters of recommendation.

### Outreach and Promotion

The council set a launch date of May 23, 2011 for the eight week broad outreach effort, with applications due on or before July 22, 2011. Outreach on the RFP consisted of:

- Airing promotional announcements on all of the NBC Owned Television Stations other than KNSD.



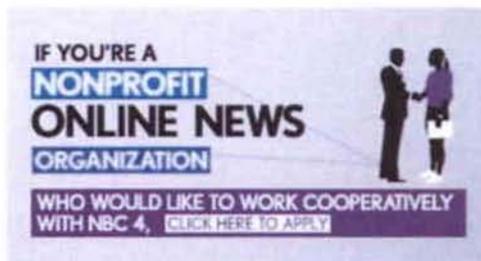


The screen captures pictured above are from a 15 second spot that aired on NBC Washington and featured the following voice-over:

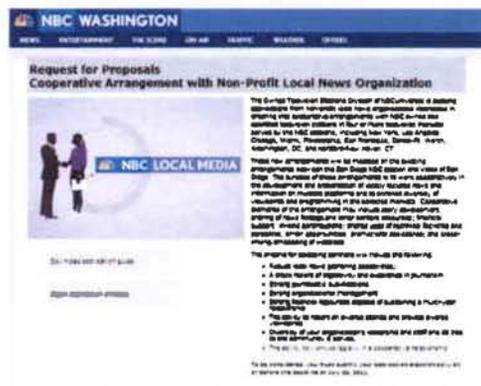
“NBC 4 is looking for a local, non-profit online news organization for a possible arrangement focused on reporting on issues of concern or interest to the diverse communities of the Greater Washington Metropolitan Area. For more information, go to [nbcwashington.com/nonprofit](http://nbcwashington.com/nonprofit).”

As of July 22, 2011, the NBC Owned Television Stations had aired more than 1,800 promotional announcements inviting interested parties to visit the website and submit an application.

- Placing advertisements on each NBC Owned Television Station’s website, generating over 3.8 million ad impressions across the sites.



- Creating a link on each station’s website (other than KNSD’s) to the application form and information on the application process (e.g., [www.nbcwashington.com/nonprofit](http://www.nbcwashington.com/nonprofit)).



- Issuing a press release that described the project and included links to the relevant section of the stations' websites (Exhibit B).
- Communicating directly with any organizations that had proactively contacted NBCU based on press reports describing the online local news condition imposed by the Comcast-NBCUniversal order.
- Emails describing the project were sent to the heads of six diverse journalism organizations, which encouraged these organizations to make their members aware of the potential opportunity. These organizations are National Association of Black Journalists, National Association of Hispanic Journalists, Native American Journalists Association, Asian American Journalists Association, South Asian Journalists Association and National Lesbian and Gay Journalists Association.

### **Framework for the RFP Review**

The Advisory Council agreed that each qualifying application would be reviewed in full by three people – the in-market news director, a second news leader to be randomly assigned and either a member of the law department or the Vice President of News Standards and Policies, also to be randomly assigned. For this purpose, “qualifying” means those applications that contained answers to all questions and supplied all requested documents or adequately explained the absence of such documents. The pool of applicants will be narrowed through this paper review. The number of finalists will be determined based on the total number of qualifying applicants and the spread in their scores based on the paper review. The finalists will be subject to a second review, including a site visit, discussion of business terms, follow-up questions, reference checking and background checking.

### **CURRENT STATUS**

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As of the July 22 application deadline, 32 complete and qualifying applications were received. These applications have been assigned to review teams, and the paper review is in progress. It is anticipated that both the paper review and the second-level review will be completed by the end of August and that the final selection of local online news partners will be made at that time. In the event these applications do not yield sufficient viable candidates, it may be necessary to revisit the timeline and consider other avenues for outreach.

# EXHIBIT A

JULY 2011

# PROGRESS REPORT

**NBCUniversal**



NBC NEW YORK

Q HZ V

HQ WHUWD IQ P HQ W

WKHAF HQ H

R Q #BU

WUJ LIF

Z HDWKHU

P IIHUV

## Request for Proposals Cooperative Arrangement with Non-Profit Local News Organization



The Owned Television Stations Division of NBCUniversal is seeking applications from non-profit local news organizations interested in entering into cooperative arrangements with NBC owned and operated television stations in four or more television markets served by the NBC stations, including New York, Los Angeles, Chicago, Miami, Philadelphia, San Francisco, Dallas-Ft. Worth, Washington, DC, and Hartford-New Haven, CT.

These new arrangements will be modeled on the existing arrangements between the San Diego NBC station and Voice of San Diego. The purpose of these arrangements is to work cooperatively in the development and presentation of locally focused news and information on multiple platforms and to enhance diversity of viewpoints and programming in the selected markets. Cooperative elements of the arrangement may include story development, sharing of news footage and other content resources; financial support; in-kind contributions; shared use of technical facilities and personnel; on-air opportunities; promotional assistance; and cross-linking/embedding of websites.

The criteria for selecting partners will include the following.

- Robust local news gathering capabilities;
- A track record of objectivity and excellence in journalism
- Strong journalistic qualifications
- Strong organizational management
- Strong financial resources capable of sustaining a multi-year relationship
- The ability to report on diverse stories and provide diverse viewpoints,
- Diversity of your organization's leadership and staff and its ties to the community it serves.
- The ability to work collegially in a cooperative relationship

[Download application guide.](#)

[Begin application process.](#)

**To be considered, you must submit your application electronically on or before the deadline of July 22, 2011.**



NBC  
NEW YORK

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[Terms of Service](#) | [Privacy Policy](#)

[Non-Profit Online Local News Project Application](#)  
[FCC Independent Programming Report](#)  
[FCC News and Informational Programming Report](#)



[Archive](#) | [Feedback](#) | [About Us](#) | [Advertise](#)

### NEWS

- Local
- Politics
- Sports
- Health
- Tech
- Weird
- Weather
- The 20
- U.S. & World
- 9/11 Anniversary
- Go Healthy NY

### THE SCENE

- Food & Drink
- Fashion
- Shopping
- Events
- Real Estate
- Cars
- Open House
- Nonstop Sound
- Thread NY
- The Feast

### ENTERTAINMENT

- Celebrity
- Movies
- Television
- Music
- PopcornBiz

### ON AIR

- As Seen On
- Shows
- Contests
- Community
- About Us
- TV Schedule
- LX TV
- NY Nonstop
- CNBC
- Television Without Pay
- Access Hollywood
- Bravo
- Village

### WEATHER

- Forecast
- Maps & Radar
- Severe Weather Alerts
- School Closing Alerts
- Weather Stories

### TRAFFIC



## Request for Proposal

Please note that all attached files must have a unique file name or else they will be overwritten.

Name of Organization

Street Address

City

State

Zip Code

Phone no.

Contact

Email address

Website URL

(e.g., <http://www.example.com>)

### I. General Information About Your Organization

1. What is the core mission or purpose of your organization?

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

2. Describe your organization's involvement in local news gathering and reporting, including the geographical area and topical focus (if any) of your coverage.

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

3. On what platforms does your organization distribute content? Provide details for each platform checked below:  
(Multiple selection allowed, must fill in detail if item is selected)

Website

Print publication

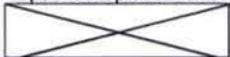
- TV Station
- Cable Channel
- Radio
- Mobile
- Other

4. Do you have content partnerships with any other media outlets or organizations?

Yes  No

4a. If yes, please list and describe the relationship(s).

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

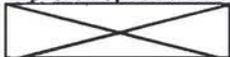


5. Do you share links or cross-link with the websites of other organizations?

Yes  No

5a. If yes, please list and provide the URLs of these websites.

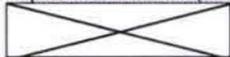
Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)



## II. Governance, Leadership and Structure

1. Please provide a copy of your organization's charter and bylaws.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)



2. Please provide a list of the organization's officers and members of the organization's board of directors or board of trustees, including name and position within the organization.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

3. Is your organization affiliated formally or informally with any governmental agencies or community organizations?

Yes  No

3a. If yes, please provide details below:

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

4. Please describe the extent to which your organization's governance and leadership reflect the diversity of communities in the area.

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

### III. Newsgathering Capabilities

1. What is the size of your editorial staff?

Paid

Volunteer

2. What is the size of the remainder of your staff (not including editorial)?

Paid

Volunteer

3. Describe your organization's infrastructure for news gathering and news production.

- i. Please note if you have electronic news gathering and/or post production capabilities.
- ii. Please provide background on your staff's background, experience, qualifications
- iii. Please describe with some detail your journalistic output: spot news; investigative reporting; analysis; features; etc.
- iv. Any other background on your organization's local community news reporting capabilities, including any particular capabilities with respect to diverse communities in the market

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

4. Diversity of backgrounds in your organization's leadership and staff will be a relevant factor in determining whether your organization can help NBC Local Media achieve the goal of enhancing diversity of viewpoints and programming. To the extent not already included in prior responses, please provide any additional information about your organization that you would like us to consider in this regard.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

#### IV. Funding and Resources

1. Please identify your primary funding sources for 2008, 2009 and 2010, including all donations or grants of \$10,000 and above in any single year.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

2. Please provide financial statements (including audited financial statements, if available or IRS Form 990) for 2008, 2009 and 2010, including verification of your tax exempt status each year, and any philanthropic efforts or donations you have made.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

3. Does your organization accept advertising?

Yes  No

4. Do you have written advertising standards?

Yes  No

4a. If yes, please provide a copy.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

#### V. Journalism Policies

1. Does your organization have written standards for the journalists who provide content used on your platforms?

Yes  No

1a. If yes, please provide a copy of your standards and describe how new journalists are trained.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

2. Does your organization have a correction/retraction policy?

Yes  No

2a. If yes, please attach a copy.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .pptx, .zip)

3. Does your organization have an ombudsperson?

Yes  No

3a. If yes, please provide the ombudsperson's name and describe his/her responsibilities.

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .ppbx, .zip)

4. Does your organization take editorial policy positions or endorse candidates?

Yes  No

4a. If yes, what rules or policies does the organization have in place to separate the "editorial/policy" activities from journalistic news coverage?

Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .ppbx, .zip)

## VI. Audience Make-Up and Distribution of Content

1. Describe the composition of your target audience. Be as specific as possible and include demographic, geographic and psychographic profiles.

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .ppbx, .zip)

2. For your website, please provide the following audience information with sources listed:

Average monthly page views for 2010:

Average monthly unique visitors for 2010:

Average monthly video views for 2010:

Primary referral sources of web traffic in 2010:

3. How do you use social media?

Optional: Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .ppbx, .zip)

4. How much content is published per week by platform? Describe how many stories, articles, blogs, videos, etc. are published each week.

Website

Print publication

TV Station

Cable Channel

Radio

Mobile

Other

**VII. Other**

Please provide a brief statement explaining why your organization is interested in working with NBC Local Media and how working with your organization would help us achieve the goals of expanding the availability of locally focused news and information in our television markets and enhancing diversity of viewpoints and programming.

Please attach letters of recommendations from two individuals familiar with the work of your organization.  
Upload a document (.doc, .docx, .pdf, .rtf, .xls, .xlsx, .ppt, .ppbx, .zip)

Clear the form

Submit form

# **EXHIBIT B**

**JULY 2011**

# **PROGRESS REPORT**

**NBCUniversal**

## NBC LOCAL MEDIA ANNOUNCES MULTI-CITY SEARCH FOR LOCALLY-FOCUSED, NON-PROFIT NEWS ORGANIZATIONS

Posted June 1st, 2011 NBC Owned Television Stations

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**NBC Local Media Announces Multi-City Search For Locally-Focused, Non-Profit News Organizations To Cooperate In News Gathering and Reporting**

**Publishing Of Request For Proposals Initiates Process of Identifying**

**Non-Profit Outlets in Markets Served by NBC's Owned & Operated Stations**

**Effort Modeled On Successful Relationship Between KNSD, The NBC-Owned Station in San Diego, and Non-Profit News Group [voiceofsandiego.org](http://voiceofsandiego.org)**



**May 23, 2010, New York, NY** – The Local Media Division of NBCUniversal announced today that it is seeking applications from non-profit, locally-focused news organizations interested in entering into cooperative news gathering and reporting arrangements with NBC owned-and-operated (O&O) television stations in New York, Los Angeles, Chicago, Miami, Philadelphia, San Francisco, Dallas-Ft. Worth, Washington, DC, and Hartford-New Haven, CT. Today's announcement furthers a commitment to localism made by NBC and Comcast when the companies announced the formation of their joint venture in December of 2009.

NBC will seek to establish cooperative arrangements between non-profit news groups and NBC local news teams. These arrangements may include a variety of elements, ranging from story development to sharing of news footage and other content resources; shared use of technical facilities and personnel; on-air opportunities; promotional and other assistance; and cross-linking/embedding of websites.

The model for these new relationships is an existing arrangement between KNSD, the NBC-owned station in San Diego, California and [voiceofsandiego.org](http://voiceofsandiego.org), a non-profit news organization that has been providing news and information to the local community for six years. Through this initiative NBC is targeting the extension of the model to at least four more of its ten O&O stations, which will bring the number of markets participating in this initiative to at least five.

Organizations interested in applying should have robust news gathering capabilities, a track record of accuracy, fairness and independence in their journalistic efforts, and an ability to provide diverse viewpoints and programming. Requests for proposals specific to each market, together with application forms and more detailed information about the application process are now available at the URLs listed at the bottom of this page. Applications, which will be reviewed by an advisory council that will include NBC Local Media news directors, standards and policy representatives, regulatory affairs executives, and senior counsel, must be submitted by July 22. The company's goal is identify successful candidates by the end of summer, 2011.

"We're looking for top-notch, non-profit news organizations that can work cooperatively with our local NBC news teams to create unique content for both their own platforms and our news platforms," commented John Wallace, President, NBC Local Media. "As we roll out the search process, we'll focus on groups that apply the same high standards of credibility and professionalism that NBC brings to all of its news coverage. And, in keeping with our broad commitment to diversity, we'll also be looking for outlets that represent a range of diverse communities and viewpoints in the markets they serve."

"This initiative is a key step in addressing the commitment we made to increasing localism," commented Rick Cotton, Executive Vice President and General Counsel, NBCUniversal. "It will also help ensure that our communities have broad access to local news and information, while at the same time giving an important boost to non-profits."

"The [voiceofsandiego.org](http://voiceofsandiego.org) staff includes some of the most dedicated news professionals I've ever worked with," commented Greg Dawson, KNSD's News Director. "Since we began working with [voiceofsandiego.org](http://voiceofsandiego.org) in 2006 we've collaborated on everything from investigative reporting to news production, and we've been able to deliver some great stories through both our broadcast, and [voiceofsandiego.org](http://voiceofsandiego.org)'s news site. We've also developed compelling weekly features such as 'Fact Check,' through which we test the accuracy of quotes from local and national politicians. Overall, it's been good for news in our city, and I'm excited to see the model replicated elsewhere."

"A good partnership optimizes the best talents of each organization and creates something powerful neither of them could do alone. This is what's happened here," Commented Scott Lewis, CEO of [voiceofsandiego.org](http://voiceofsandiego.org). "NBC San Diego has been willing to try new, innovative ways of explaining complicated news and holding people accountable while at the same time bringing decades of broadcast experience to the table to ensure it's done right. I'm excited to see other stations and partners around the country get together and think about what they can innovate."

Details on the application process for each of the markets involved can be found at the following links:

New York City  
[nbcnewyork.com/nonprofit](http://nbcnewyork.com/nonprofit)

Los Angeles  
[nbcla.com/nonprofit](http://nbcla.com/nonprofit)

Chicago  
[nbcchicago.com/nonprofit](http://nbcchicago.com/nonprofit)

Miami  
[nbcmiami.com/nonprofit](http://nbcmiami.com/nonprofit)

Philadelphia  
[nbcphiladelphia.com/nonprofit](http://nbcphiladelphia.com/nonprofit)

San Francisco  
[nbcbayarea.com/nonprofit](http://nbcbayarea.com/nonprofit)

Dallas-Ft. Worth  
[nbcdfw.com/nonprofit](http://nbcdfw.com/nonprofit)

Washington, DC  
[nbcwashington.com/nonprofit](http://nbcwashington.com/nonprofit)

Hartford-New Haven, CT.  
[nbcconnecticut.com/nonprofit](http://nbcconnecticut.com/nonprofit)

**Contact:**

John McKay  
Corporate Communications  
NBCUniversal  
212 664 6202

Liz Fischer  
Corporate Communications  
NBCUniversal  
212 664 4825



# **ATTACHMENT B**

# PEG Pilot Program

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**Progress report on the  
PEG Video On Demand and  
Online platforms**

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**July 28, 2011**



# Our P|E|G Trial Communities



**FRESNO**  
California

.....



**HIALEAH**  
Florida

.....



**HOUSTON**  
Texas

.....



**PETERBOROUGH**  
New Hampshire

.....



**PHILADELPHIA**  
Pennsylvania

.....

**+ MEDFORD**  
Massachusetts



# PEG Pilot Program

July 28, 2011

This report describes the progress of Comcast's pilot platform to host PEG [Public, Educational and Governmental] content on Comcast's Video On Demand ("VOD") and On Demand Online ("Online") platforms.

## Scope of the Commitment

Over the next three years, Comcast will work with community, political and PEG leaders in each of the five communities selected for this pilot program to see how best to make local programming available on VOD and Online platforms.

## Pilot Communities

On February 28, 2011, Comcast submitted a letter to the Federal Communications Commission announcing the five municipalities selected to participate in the PEG pilot program.<sup>1</sup> The five participating municipalities are:

- The City of Fresno, California;
- The City of Hialeah, Florida;
- The Town of Peterborough, New Hampshire;
- The City of Philadelphia, Pennsylvania, and;
- The City of Houston, Texas.

In addition, Comcast decided to work with a sixth community—the City of Medford, Massachusetts—as a “laboratory” to trial implementation approaches before launching Online and VOD platform programs in the five PEG pilot communities.

## Preliminary Work and Consultations with the Pilot Communities

Comcast approached the mayors of these six municipalities with an idea designed in part to inspire each community to begin thinking about its PEG programming needs. The goal was to engage the relevant stakeholders to define each community's media requirements and kick-start each community's effort to define strategic goals for their hyper-local programming, by engaging in a first step, “new media” project.

We branded this initiative **Project Open Voice**. Comcast worked with the mayors' offices in each municipality to develop a public service campaign consisting of a public service announcement (“PSA”) and an associated website designed to promote an issue of interest for the community. The

<sup>1</sup> See Letter from Lynn R. Charytan, Vice President, Legal Regulatory Affairs, Comcast Corporation, to Marlene H. Dortch, Secretary, FCC, at 1 (Feb. 28, 2011).

PSA theme chosen by each community is featured on the Project Open Voice website ([www.projectopenvoice.com](http://www.projectopenvoice.com)), a copy of which is attached hereto as an Exhibit.

Subsequently, between April and June, Comcast went back to each pilot community as well as Medford and began discussions focused specifically on the pilot projects involving PEG distribution on VOD and Online. As required by Section XIV.4.b of Appendix A to the Comcast-NBCUniversal Order,<sup>2</sup> Comcast held community “forums” with local leaders, including city officials, community leaders and PEG programmers in each of the trial communities to get direction on which PEG programming would most benefit residents by being placed on VOD and Online.<sup>3</sup>

The information provided by the participants in these meetings has guided the development of the on demand models —particularly for Online— for delivery of locally-produced content catered to each community’s needs and interests.

Each community will have a customized website to serve as the online portal to the community’s Online PEG content. Among other things, PEG forum participants were shown a prototype of the Online web portal that Comcast had presented for Medford’s consideration (shown below), to illustrate one possible approach.



<sup>2</sup> In the Matter of Applications of Comcast Corporation, General Electric Company and NBC Universal, Inc. For Consent to Assign Licenses and Transfer Control of Licensees, Memorandum Opinion and Order, MB Docket No. 10-56, 26 FCC Rcd 4238 (2011) (the “Order”).

<sup>3</sup> Of course, as required by the Order and consistent with Comcast’s own practice, all decisions regarding the PEG content ultimately to be provided for the VOD and Online projects are ultimately within the full discretion of the communities. Comcast does not exercise editorial control over those decisions, and will support whatever content the communities decide to include.

In addition, Comcast prepared a brief video presentation to explain the functionality of the sample Medford Online site. The video is available at [youtube.com/watch?v=ZvkGxHI2518](https://www.youtube.com/watch?v=ZvkGxHI2518).



Our local teams have been in regular contact with the communities since the forums were held. Each community will be engaged throughout the months of August and September to identify existing PEG content for placement on VOD in October.

### **Ongoing Work in Support of VOD and Online Platform Deployment**

Comcast has been taking various steps to ready the VOD platform in each pilot community in order to meet the October 28, 2011 launch date for the PEG VOD trials. Among other things, Comcast has worked with local VOD content managers and engineers in the Comcast system for each community to confirm that each cable system has facilities that can support delivery of PEG content to subscribers and to verify that each system has allocated capacity to host PEG programming on its VOD storage sites. Comcast is also working with local VOD content managers to identify the appropriate on-screen menu placement of new PEG content for customers.

Comcast has also had both in-person and telephonic meetings with community leaders, PEG programming personnel and local government officials in each pilot community to discuss which programming should be placed on VOD.

To date, good progress has been made on Comcast's and the communities' sides, and no issues have been identified that should hamper placement of PEG programming on VOD in the pilot communities by the October 28, 2011 deadline.

Development of the PEG Online pilot is similarly ongoing and on track to meet the January 28, 2012 deadline. Comcast has engaged the services of an interactive platform developer to build the Online foundation and functionality which will be deployed across all six local Online portals. The developer was chosen primarily for its breadth of experience in

developing the hardware and software architecture used by Comcast in other Online and streaming platforms.

Comcast is also making progress in the design of the local Online websites. After issuing a request for proposals, in mid-July Comcast selected three web design vendors to trial different creative design concepts (i.e., the look-and-feel, graphics and other multimedia components) based on each community's feedback. Each web developer has been assigned two of the six communities. Relying on three different web designers allows Comcast to experiment with three distinct creative approaches to the Online user experience with the objective of choosing the best elements from each for future Online development.

In addition, Comcast has engaged local consultants in each community to provide guidance regarding community needs and interests that the community, in turn, can use in developing PEG Online content. The consultants will work with local officials, and Comcast's local teams, so that the sites reflect each community's unique needs.



project  
open  
voice

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◀ HOME



#### Welcome to Project Open Voice!

Good local TV programming connects a community's residents. As part of Comcast's continuing support for public, educational and governmental (PEG) programming, we launched an initiative to explore new and innovative ways that this local programming can be made available in a community.

The name of this initiative is Project Open Voice.

Over the next three years, we will work closely with community, political and PEG leaders in six communities to see how best to make local programming available. Our community partners are Fresno, California; Hialeah, Florida; Peterborough, New Hampshire; Philadelphia, Pennsylvania; Houston, Texas; and Medford, Massachusetts. These communities represent a cross-section of American culture and diversity. Working together with our city partners, we hope to develop and test exciting new online and On Demand models for better delivery of locally produced content. We want to help residents get the kind of information that really connects them with what's going on around their hometowns – the places where they live, work, learn and play. We look forward to exploring new ideas, and learning from our local partners.

#### Why Is this Important?

Local TV programming serves and enriches local communities by promoting diversity, a free market of ideas, and an informed and well-educated citizenry. PEG programming provides cable subscribers with locally oriented educational information as well as a window into the operation of their state and local government, and provides local citizens with a forum for public discussion and expression. This programming helps to inform community members and improves the quality of their lives. We need to ensure that as technologies change, and the way people watch TV change, local programming keeps pace.

#### Why do a public service campaign?

Once we selected the pilot communities, we wanted to learn more about them. Our project team focused on the different histories, cultures and current affairs of each place. We wanted to understand how the people who live there used their local media. How do they watch TV? Where do they prefer to go to follow local news, sports, entertainment? How do they connect with the world around them?

We spoke with residents, city officials, PEG teams and our local staffers who live in each area. Then, we developed a unique public service announcement (PSA) campaign around an issue or objective of importance for each community – issues like parks, pet adoption, environmentalism and volunteerism. We used various new and traditional methods to spread the word about these campaigns, allowing us to explore the relationships that could develop by integrating typical TV content with the convenience of online and On Demand services.

#### Innovate=Collaborate

We will collaborate with our partners (including elected officials and their staffs, PEG channel coordinators and residents) to plan how we can build customized online portals that each community can use to launch and stream digital programming and other helpful and entertaining resources to their residents. In addition, we want to help our partners reach out more effectively to attract new audiences.

#### Follow Us

Sign up for automatic email dispatches or *join the journey* by sending your ideas and suggestions to [Project\\_Open\\_Voice@Cable.Comcast.com](mailto:Project_Open_Voice@Cable.Comcast.com).

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**FRESNO, CA**  
Parks and Recreation  
ADOPT-YOUR-PARK




0:00 / 0:00

**Putting down some new roots**

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March 29, 2011

The fifth largest city in California, Fresno means "ash tree" in Spanish and the tree's leaf is symbolized on the city's flag. Fresno is the economic hub for the nation's most bountiful agricultural region, the San Joaquin Valley. Fresno is also the largest community located on the 2012 first phase of an eventual 800-mile high speed rail project that will stretch from San Francisco/Sacramento to San Diego with trains that travel over 220 mph between destinations.

The "Best Little City in the U.S.A." is proud of its agricultural heritage and values the benefits of the beautiful green spaces woven throughout in its vibrant community of historical and modern neighborhoods.

For our pilot project here, folks at the City of Fresno asked if we could help them build awareness for their Adopt-A-Park initiative. The city has a total of 75 parks – including regional parks, neighborhood parks, action sports facilities, play structures and golf courses.

The Adopt-A-Park program was designed to gain public support to preserve and beautify the City's urban green spaces. Individuals and groups are encouraged to sign up to "adopt" a park, assisting with the care and restoration of these great spaces. The campaign we developed consisted of a PSA that directed residents to a new Adopt-A-Park website we created about the program.





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FRESNO

**HIALEAH, FL**  
After School Programs  
CREATIVE LEARNING & PLAY

### Post time Hialeah

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March 29, 2011

Sunny Hialeah, Florida, is celebrated for its large Hispanic and Latin community makeup, and is home to a vibrant business community mix of national retailers and family owned shops. Telemundo, the second largest Spanish language TV network in the United States is headquartered here. The city is also home to Hialeah Park Racetrack, one of the oldest existing recreational facilities in southern Florida. The beautiful park surroundings have also been officially designated a sanctuary for the American Flamingo by the Audubon Society.

Mayor Julio Robaina and the City put a special emphasis on making quality after-school activities available for children and youth. So after talking with local leaders, we partnered with the City to encourage more kids to get involved in the "Creative Learning & Play" (CL&P) K-8 after-school program that is held at 11 park locations throughout Hialeah. The program provides children with affordable, high quality activities in a safe, fun, and encouraging environment. Activities include reading, tutoring, homework assistance, social skills development, nutrition, fitness, recreation and special interest classes.

Working with the City, we created a bilingual promotional campaign around the CL&P programs using 30-second public service TV announcements (shown above) featuring Mayor Julio Robaina and a cast of very happy young participants. The PSA directs families to go online to the CL&P pages on the city's website to get more information about the program.

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**HOUSTON, TX**  
Responsible Pet Ownership  
BARC





### Helping everyone's best friends in Texas

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March 29, 2011

Houston has friendly people, a ready-to-go business infrastructure, affordable housing costs, beautiful sports venues, a first-class symphony and health care system – even a nearby national forest. The city is one of the fastest-growing metropolitan areas in the U.S.

Like many major cities, Houston faces challenging circumstances for its animal population and control. The City is committed to promoting responsible pet ownership through spaying/neutering, microchipping, vaccinations, and training classes. So we sat down with people in the city administration and Animal Shelter and Adoptions Department to help them find a way to curb the number of animal abuse, neglect, and stray incident reports in the city.

Together, we crafted a campaign to educate the city's residents about responsible pet care and what the city's Animal Shelter and Adoption facility calls the "four Ls": License, Leash, Latch and Love activities.

The campaign consisted of a traditional TV PSA featuring Mayor Annise Parker and some furry friends (see above) that directs residents to a new website we created for the newly named BARC animal information center. We also made available Video On Demand content that showcased pets available for adoption through the center, and created special BARC t-shirts to promote the program.

"These guys give us a lifetime of happiness," Mayor Parker states in the PSA. "Shouldn't we do the same for them?"

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**MEDFORD, MA**  
Environmentalism  
GOOD JOB MEDFORD








**On the go in Massachusetts**

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March 29, 2011

Next stop Medford, Massachusetts – an historic community bustling with citizens who are working together to create a bright future. The city was settled in 1630 as part of the Boston neighborhood of Charlestown. Its name is thought to have come from the meaning “ford by the meadow” or “Meadford” acknowledging the importance of the fordable part of the Mystic River located just west of present-day Medford Square. It is also home to Tufts University.

This is a great town of active sports fans, history buffs, philanthropists, college students and movers and shakers of all kinds. James Plimpton invented the roller skate here in 1863, Fannie Farmer started a cooking movement (hers were the first recipes with accurate measurements), and Amelia Earhart spent time here as a social worker.

Medford also is the first city in Massachusetts to draft a Climate Action Plan and install a commercial-scale wind turbine at a municipal school in the state. Citizens of Medford just knew that this was an important step that they needed to take together to help preserve community resources and be responsible stewards of their environment.

The city works closely with its residents to promote energy sustainability as a responsible way of life. Through its many demonstrated and promotional efforts, Medford hopes to inspire other communities to adopt similar programs.

City leaders asked if we could help them get the word out about their Go Green Medford umbrella program of environmentally positive services and activities. Our pilot project with them included a public service announcement (see it above) that aired on local TV stations, development of the Go Green Website and the distribution of branded, reusable water bottles.

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**PETERBOROUGH, NH**  
Tourism  
CATCH UP ON LIFE





**Curries & Ives come to life**

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March 29, 2011

Peterborough, New Hampshire, is the quintessential American small town. The town is notable for its beautiful country village setting, arts and cultural treasures (it's the home of the famous McDowell Colony of working artists), galleries and crafts shops. The town is rich early American history and home to 6,000 permanent residents. Peterborough also inspired the setting for the play Our Town, written by Thornton Wilder.

Tourism is important to the economic vitality of this charming community, tucked away in the quiet countryside of southern New Hampshire.

As a rural community, Peterborough faces a unique challenge – how to communicate about its activities and events, not only with its residents but also throughout New England. We worked with the people of Peterborough to come up with a campaign using a locally placed PSA and an online promo site, CatchUpOnLife.com, that tout the beauty and amenities of the area and its relative ease of access – “Just a short 90-minute drive from Boston....”





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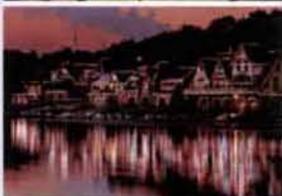
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**PHILADELPHIA, PA**  
Volunteerism  
SERVE PHILADELPHIA




### The Journey Begins

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March 29, 2011

We kicked off our Project Open Voice journey of discovery in Philadelphia, our hometown, and a vibrant city steeped in history, beautiful neighborhoods, great dining and nightlife, and a trend-setting arts and cultural scene that is one of the highlights of the eastern seaboard. It's known as the City of Brotherly Love, and Philadelphians have a natural willingness to give back to their community in meaningful ways.

When we met up with Mayor Nutter and Philadelphia city folks in February, they told us they were looking for new ways to expand volunteerism — there are many volunteer opportunities in the city that suit just about any age or interest. Working together with the city administration, we created a public service campaign that could help them get the word out about new and existing volunteer positions open around town. The "SERVE Philadelphia" campaign was designed to contribute to community vitality by making it easier for citizens of every age to volunteer.

The campaign consisted of a traditional PSA (watch it above) designed to air on local TV stations, paired with grassroots marketing activities, including website development, T-shirts and post card distributions, that directed Philadelphians to the volunteer information website, [ServePhiladelphia.com](http://ServePhiladelphia.com).

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