

July 30, 2012

# **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 cooperative arrangements with locally focused non-profit news organizations ("Non-Profit News Partnerships"). <u>See</u> Attachment A. The report is required by Section XI.5.f of Appendix A to the *Transaction Order*. A copy of this report will be available today on the homepage of each NBC Owned Television Station.
- b. Semiannual progress report on Comcast's development of the platform to host Public, Educational, and Governmental ("PEG") 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 *Transaction Order*. A copy of this report will be available today on <a href="https://www.comcast.com/peg">www.comcast.com/peg</a>.

\_

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, 26 FCC Rcd 4238 (2011), as amended by the Erratum released on March 9, 2011 ("Transaction Order").

Ms. Marlene H. Dortch July 30, 2012 Page 2

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

Sincerely yours,

Lynn R. Charytan

Lynn R. Charytan

Vice President, Legal Regulatory Affairs,

Senior Deputy General Counsel,

Comcast Corporation

# Enclosures

cc (by e-mail): Martha Heller

Deputy Chief, Industry Analysis Division

Media Bureau

Martha.Heller@fcc.gov

Jeff Gee

Deputy Chief, Investigations & Hearings Division

Enforcement Bureau Jeffrey.Gee@fcc.gov

cc (by hand delivery): Chief, Industry Analysis Division

# NBCUniversal Non-Profit News Partnerships

# **Progress Report**

July 30, 2012



PROGRESS
REPORT

Comcast, NBCUniversal



# **JULY 2012**

# NON-PROFIT NEWS PARTNERS PROGRESS REPORT

This report summarizes the steps NBCUniversal has taken during the reporting period of **January 28, 2012 to July 28, 2012** to satisfy its obligations under Appendix A, Condition XI.5 (the "Condition") of the Comcast-NBCUniversal Order.<sup>1</sup>

Per Condition XI.5(f), this report describes the status of the non-profit news partnership arrangements, including a description of the support provided by NBCUniversal to each news partner organization, and information about the news and other programming produced by the arrangement, including the overall quantification by market of local content segments or items generated, as well as their nature (including but not limited to videos, articles, blog posts, and photos), and whether the station's primary channel, multicast channel(s), website, or other platforms exhibited such segments or items.<sup>2</sup> A copy of this report has been posted on the websites maintained by the NBC-owned television stations.

As the January 2012 progress report described, <sup>3</sup> NBCUniversal satisfied the Condition's requirement that at least four of the 10 stations in its NBC Owned Television Stations division enter into cooperative arrangements with locally-focused, non-profit news organizations: NBC 4 New York partnered with ProPublica (<a href="www.propublica.org">www.propublica.org</a>); NBC 5 Chicago partnered with *The Chicago Reporter* (<a href="www.chicagoreporter.com">www.chicagoreporter.com</a>); NBC 10 Philadelphia partnered with WHYY (<a href="www.whyy.org">www.whyy.org</a>); and NBC 4 Los Angeles partnered with KPCC Southern California Public Radio (<a href="www.scpr.org">www.scpr.org</a>).

In the first months of these partnerships, the collaborations have resulted in at least seven major investigations, including two with nation-wide implications. These investigations have generated dozens of news reports on the NBC-owned stations and websites, as well as on the partners' radio stations, publications, and websites, supported by the data, research, and in-depth investigative efforts of their news partners. In fact, a May 2012 article by TVNewsCheck.com reported that the

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), as amended by the Erratum released on March 9, 2011 ("Comcast-NBCUniversal Order").

<sup>&</sup>lt;sup>2</sup> Unless otherwise indicated, all of the referenced news stories were telecast on the stations' primary channels.

See Letter from Lynn R. Charytan, Vice President, Legal Regulatory Affairs, Senior Deputy General Counsel, Comcast Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, MB Docket No. 10-56 (Jan. 30, 2012) at Attachment A ("January 2012 Report").



partnerships have already resulted in "an uptick in investigative reports on local newscasts."

The NBC-owned stations also added a dedicated investigative reporting section to each of their websites that will feature videos and other resources related to stories produced by the news partnerships, such as investigative reports resulting from the collaboration between several NBC-owned stations and ProPublica.<sup>5</sup>

Beyond this reciprocal investigative and content production support, NBCUniversal also has provided financial assistance to each of its five news partners.

# UPDATE ON THE NEWS PARTERNSHIPS





# **Collaboration and Support**

NBC 4 New York and ProPublica conduct regular conference calls to ensure that NBC 4 New York and the other NBC-owned stations always have an up-to-date understanding of the research and investigative data that ProPublica has available. Where NBC 4 New York sees an appropriate opportunity to use the ProPublica investigative data, producers "transform" the data into special investigative segments for NBC 4 New York's newscasts.

NBCUniversal support for ProPublica includes participation of ProPublica's investigators during news segments, online references and links to ProPublica to build name recognition and support for the organization, and financial assistance to help support the ongoing mission. ProPublica will also provide the results of its data-based journalism—what it calls "news applications" 6—to all 10 stations that compose the NBC Owned Television Stations division.

See Diana Marsalek, NBC O&Os, Nonprofits Make News Deal Work, TVNewsCheck.com, http://www.tvnewscheck.com/article/59742/nbc-oos-nonprofits-make-news-deal-work (May 29, 2012).

See, e.g., Press Release: NBCUniversal, NBC Owned Stations Launch New Platforms to Feature Investigative Stories, <a href="http://www.nbcuniversal.presscentre.com/Press-Releases/nbc-owned-stations-launch-new-platforms-to-feature-investigative-stories-2853.aspx">http://www.nbcuniversal.presscentre.com/Press-Releases/nbc-owned-stations-launch-new-platforms-to-feature-investigative-stories-2853.aspx</a> (May 1, 2012).

See ProPublica's Report to Stakeholders (January-April 2012), available online at <a href="http://s3.amazonaws.com/propublica/assets/about/PP">http://s3.amazonaws.com/propublica/assets/about/PP</a> Report to Stakeholders January-April 2012.pdf.



# **Key Projects**

In the last six months, NBC 4 New York has aired stories based on two major joint investigations with ProPublica. The stories also ran on NBC 4 New York's multicast "Nonstop" channel during the 7:00 p.m. newscast on the dates indicated below.

# Federal Stimulus Money

- Based on federal stimulus tracking data collected, sorted and presented in an interactive database developed by ProPublica, NBC 4 New York's "I-Team" (the news department's investigative unit) found more than 200 approved stimulus-funded projects totaling more than \$200 million in New York, New Jersey, and Connecticut are still listed as "not started," despite the fact that many of these projects had been touted as "shovel ready."
- The story, which also featured a ProPublica investigative journalist, aired on February 14, 2012 on NBC 4 New York during the 5:00 pm and 7:00 p.m. newscasts.<sup>7</sup> NBC 4 New York also provided an accompanying online story that included a link to the tracking database on the ProPublica website (<a href="http://projects.propublica.org/recovery/">http://projects.propublica.org/recovery/</a>) for viewers who wish to chart the progress of stimulus projects in their areas.

# Kidney Dialysis Centers

- Based on data collected by ProPublica, NBC 4 New York reported that
  patients at certain Tri-State area dialysis centers located in low-income
  areas were less likely to get transplants than patients at other dialysis
  centers.
- The story aired on NBC 4 New York on April 26, 2012 at 11:00 p.m.<sup>8</sup> and received at least one full day of on-air promotion. The results of the investigation were also posted on the NBC 4 New York website, where the story remained popular for several days.<sup>9</sup> The data collected by ProPublica were shared with other NBC-owned stations and resulted in locally focused newscasts and companion website articles in those markets.<sup>10</sup>

See Tom Burke and Chris Glorioso, I-Team: Millions of Stimulus Dollars Still Unused in Tri-State, http://www.nbcnewyork.com/investigations/I-Team-Millions-of-Stimulus-Dollars-Still-Unused-139315393.html (Feb. 14, 2012).

See Chris Glorioso, *I-Team: Patients at Some Dialysis Centers Get Fewer Kidney Transplants*, <a href="http://www.nbcnewyork.com/news/local/Kidney-Transplant-Disparity-Dialysis-ProPublica-I-Team-149269465.html">http://www.nbcnewyork.com/news/local/Kidney-Transplant-Disparity-Dialysis-ProPublica-I-Team-149269465.html</a> (Apr. 26, 2012).

<sup>9</sup> *Id* 

Id

See, e.g., Nesita Kwan, Dialysis Danger: Why Location Matters for Some Kidney Patients, http://www.nbcchicago.com/investigations/Dialysis-Danger-Why-Location-Matters-for-Some-Kidney-Patients-148017845.html#ixzz20Eqa9xRH (Mar. 18, 2012); Tisha Thompson, Dialysis Center Ratings, http://www.nbcwashington.com/investigations/Dialysis-Center-Ratings-147820675.html (Apr. 27, 2012).







# **Collaboration and Support**

The NBC 5 Chicago news team holds regular meetings with *The Chicago Reporter's* staff with the goal of increasing the coordination between the two news organizations. One of the primary goals is to synchronize the airdates of stories airing on NBC 5 Chicago to coincide with *The Chicago Reporter's* publication dates for companion or related pieces. This collaborative approach helps each party benefit from the public interest in the stories they are producing and capitalize on the ability to reach consumers on multiple platforms. NBCChicago.com editors also provide a link-back to the associated *The Chicago Reporter* publication for each piece that was produced in partnership. In addition, NBCChicago.com provides social media support by posting each partnershipgenerated story on NBC 5's Twitter and Facebook feeds. *The Chicago Reporter* also provides a reporter as a resource for NBC 5 Chicago on-air stories.

# **Key Projects**

The partnership produced a number of investigative reports that have aired on NBC 5 Chicago and on Telemundo Chicago:

# Financial Practices of Rev. Leon Finney and Entry House

- The first collaboration between NBC 5 Chicago and *The Chicago Reporter* focused on Dr. Leon Finney, Jr., a high-profile Chicago minister and community organizer who received hundreds of millions of dollars in federal grants to provide services to people on Chicago's South Side. A report in *The Chicago Reporter*'s January-February 2012 issue questioned how Dr. Finney and his organizations spent much of this money.
- NBC 5 Chicago's "Unit 5" investigative team expanded on The Chicago Reporter's investigation by profiling one of Dr. Finney's organizations — a drug and alcohol rehabilitation center called Entry House. Entry House had received tens of millions of dollars in government grants, yet failed to pay its employees on time. Following these investigations, the Illinois Department of Human Services and the Office of the Illinois Attorney General began looking into the financial practices of Entry House and Dr. Finney's organizations.
- The initial story aired on January 19, 2012 during NBC 5 Chicago's 10:00 p.m.
   newscast. 11 A follow-up story aired on March 2, 2012 on the 6:00 p.m. edition

See Katy Symser, State Agencies Looking Into Entry House's Books, <a href="http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-137734013.html">http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-137734013.html</a> (Jan. 19, 2012).



of the NBC 5 Chicago news.<sup>12</sup> The story re-aired on the 10:00 p.m. news on March 2, 2012 and the next day's early news shows. Both the original and follow-up stories were posted on the NBC 5 Chicago website.

# Wage Theft

- Following up on a story in the March-April 2012 issue of *The Chicago Reporter*, Unit 5 profiled a low-wage worker who had tried unsuccessfully to recoup thousands of dollars in back pay from his employer by filing a claim before the Illinois Department of Labor ("IDOL"). *The Chicago Reporter* analyzed hundreds of IDOL claims and found that the agency failed to recover the majority of the unpaid earnings owed to low-wage workers.
- Unit 5's report aired on March 8, 2012 during the 5:00 p.m. edition of NBC 5
   Chicago's newscast.<sup>13</sup> An abridged version of the story aired on the 10:00 p.m. news on the same day.
- Because many of the workers profiled in *The Chicago Reporter's* story were Latino, NBC 5 Chicago referred the profiled worker to Telemundo Chicago, an NBCUniversal-owned television station, which was then able to do a separate interview with the worker for a companion piece. Telemundo Chicago aired its story on March 8, 2012 on the 5:00 p.m. and 10:00 p.m. newscasts.<sup>14</sup>

# Police Brutality

- In conjunction with the May-June 2012 issue of *The Chicago Reporter*, NBC 5
   Chicago aired a story on Chicago policemen who remain on the force after having been repeatedly accused of brutality and misconduct. Unit 5 profiled a man who had allegedly been beaten by one of these policemen.
- The NBC 5 Chicago story aired on May 1, 2012 on the 10:00 p.m. newscast, the same day that *The Chicago Reporter's* issue first hit the stand. NBC 5 Chicago's website posted video of the story, along with a complete print version of the story and several original documents featured in the report, including court documents, police complaints, and direct links to the various databases maintained by the City of Chicago.<sup>15</sup>

See NBC 5 Chicago, Employees Say "Entry House" Closure is Retribution, <a href="http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-141271103.html">http://www.nbcchicago.com/news/local/chicago-reporter-unit-5-woodlawn-corporation-entry-house-leon-finney-jr-141271103.html</a> (Mar. 2, 2012).

See Lisa Capitanini and Marion Brooks, Workers Say Company Shut Doors, Never Paid Them, <a href="http://www.nbcchicago.com/investigations/unit-5-chicago-reporter-wage-theft-142001553.html">http://www.nbcchicago.com/investigations/unit-5-chicago-reporter-wage-theft-142001553.html</a> (Mar. 8, 2012).

See Telemundo Chicago, Video: Esperando en vano, <a href="http://www.telemundochicago.com/content-center/Esperando-en-vano-141964573.html">http://www.telemundochicago.com/content-center/Esperando-en-vano-141964573.html</a> (Mar. 8, 2012).

See Rob Stafford and Katy Smyser, Millions Paid to Settle Police Misconduct Suits, http://www.nbcchicago.com/investigations/unit-5-chicago-reporter-chicago-police-ipra--149771045.html (May 1, 2012).







# **Collaboration and Support**

NBC 10 Philadelphia and WHYY have developed a strong relationship in the distribution of online news content. Each day, NBC 10 Philadelphia and WHYY share a list of stories, and NBCPhiladelphia.com generally adds links on its website to at least three articles originally posted on NewsWorks.org (NBC 10 Philadelphia is the top referrer of web traffic to NewsWorks.org). WHYY provides NBC 10 Philadelphia with local political commentary, local arts and cultural coverage; in exchange, NBC 10 Philadelphia provides daily weather content to WHYY's NewsWorks.org website. In addition, NBC 10 Philadelphia posts a WHYY weekly segment (FLICKS by Patrick Stoner) on its site.

# **Key Projects**

The partnership has also resulted in broadcast segments described below. More indepth interviews related to these segments ran on the NBC 10 Philadelphia multicast channel, "Philadelphia Nonstop".

# Training Sled Dogs in the Sands of the New Jersey Pine Barrens

In a report that aired on February 3, 2012 on NBC 10 Philadelphia, WHYY reporter Peter Crimmins shared his report on sled dogs training on sand in the Pine Barrens of New Jersey.<sup>16</sup> The story was also available on NBC 10 Philadelphia's website, and on the NewsWorks.org website.<sup>17</sup>

### New Jersey Wineries

On March 14, 2012, NBC 10 Philadelphia aired a report based on an interview with WHYY reporter Jen Howard on the New Jersey wine making industry and the results of a recent taste test on New Jersey wines. <sup>18</sup> The story was also available on NBCPhiladelphia.com and on the NewsWworks.org website. <sup>19</sup>

See NBC 10 Philadelphia, Video: South Jersey Sled Dogs, <a href="http://www.nbcphiladelphia.com/video/#!/on-air/as-seen-on/South-Jersey-Sled-Dogs/138647844">http://www.nbcphiladelphia.com/video/#!/on-air/as-seen-on/South-Jersey-Sled-Dogs/138647844</a> (Feb. 2, 2012).

See Video: Peter Crimmins, Call of the Mild: Sled Dogs Mush through the Sands of New Jersey, http://www.newsworks.org/index.php/also-on-nwt/item/33422-01pcdogs (Feb. 1, 2012).

See Video: New Jersey Wine, <a href="http://www.nbcphiladelphia.com/video/#!/the-scene/food-drink/New-Jersey-Wine/142707875">http://www.nbcphiladelphia.com/video/#!/the-scene/food-drink/New-Jersey-Wine/142707875</a> (Mar. 14, 2012).

See Jen Howard, The Judgment Of Rittenhouse: A Blind Tasting Puts N.J. Wineries to the Test, http://www.newsworks.org/index.php/new-jersey-more/item/35074-the-judgment-of-rittenhouse-a-blind-tasting-puts-nj-wineries-to-the-test- (Mar. 14, 2012).







# **Collaboration and Support**

KPCC and NBC 4 Los Angeles ("LA") have forged a successful partnership by collaborating on stories where KPCC provides in-depth research while NBC 4 LA gathers sound and other elements to create stories that blend the strength of the two news outlets. The digital teams at both stations regularly interact to optimize the quality and selection of multimedia and other interactive content posted on their respective websites. News executives from both organizations currently are discussing plans for Olympics coverage and new investigations for the rest of 2012.

NBCUniversal supported KPCC by providing producer and talent resources, material acquired in the field, and promotional benefit on both broadcast and web.

## **Key Projects**

This partnership between KPCC and NBC 4 LA has led to a variety of important news collaborations, some of which are discussed below:

### Los Angeles Schools Sexual Abuse

- A breaking story regarding a local school teacher arrested on charges of sexually abusing students shaped the beginning of the NBC 4 LA/KPCC partnership. NBC 4 LA and KPCC quickly dedicated resources to look at all aspects of what became a major crisis for the Los Angeles Unified School District (LAUSD), the second largest school district in the country. The investigation unearthed a document that showed that the school district paid the alleged abuser a large amount to agree to retire, including full pension and health benefits.
- NBC 4 LA and KPCC broke the story on their respective stations and websites, leading to calls from California legislators to change state law to make it easier to fire disgraced teachers and make them forfeit pension and health benefits.
- The story broke on NBC 4 LA on February 9, 2012.<sup>20</sup> Web versions of the stories were posted simultaneously on NBCLosAngeles.com and the KPCC website.<sup>21</sup> In

See Joel Grover and Chris Henao, LAUSD Paid Miramonte Teacher to Resign, http://www.nbclosangeles.com/news/LAUSD-Miramonte-Elementary-School-Mark-Berndt-139058999.html (Feb. 9, 2012).

See Tami Abdollah and Shirley Jahad, LAUSD Paid \$40,000 to Settle Case with Miramonte Teacher Mark Bernd, <a href="http://www.scpr.org/blogs/education/2012/02/09/4616/lausd-paid-40000-settle-case-miramonte-teacher-acc/">http://www.scpr.org/blogs/education/2012/02/09/4616/lausd-paid-40000-settle-case-miramonte-teacher-acc/</a> (Feb 9, 2012).



the days and weeks following this story, NBC 4 LA and KPCC ran at least 10 follow up reports. NBC 4 and KPCC continue to cover the story, and follow ups have run as recently as June 28, 2012. 123

# Los Angeles Fire Department Response Time

NBC 4 LA and KPCC worked together on an exclusive investigation into Los Angeles Fire Department response times. The story broke on February 29, 2012 during the NBC 4 LA 11:00 p.m. newscast<sup>24</sup> and the next day on KPCC's talk shows.<sup>25</sup> Both news organizations continued to follow up on the story, and coverage continued on NBC 4 LA through May 18, 2012.<sup>26</sup>

# Pope Benedict's Visit to León, Mexico

- NBC 4 LA shared with KPCC its March 2012 coverage of Pope Benedict's visit to the Mexican city of León. The coverage of the Pope's visit first aired on NBC 4 LA on March 22, at 5:00 p.m. and ran for several days<sup>27</sup> and was first carried by KPCC on the same dates.<sup>28</sup>
- See, e.g., EXCLUSIVE: LAUSD Paid Miramonte Teacher to Resign,
  <a href="http://www.nbclosangeles.com/video/#!/news/top-stories/video-override/EXCLUSIVE--LAUSD-Paid-Miramonte-Teacher-to-Resign/139070999">http://www.nbclosangeles.com/video/#!/news/top-stories/video-override/EXCLUSIVE--LAUSD-Paid-Miramonte-Teacher-to-Resign/139070999</a> (Feb. 10, 2012).
- See Kim Baldonado and Bill French, LAUSD Superintendent "Disheartened" After SB 1530 Dies in Committee, <a href="http://www.nbclosangeles.com/news/local/Legislature-Kills-Expedited-Teacher-Review-Bill-160641755.html">http://www.nbclosangeles.com/news/local/Legislature-Kills-Expedited-Teacher-Review-Bill-160641755.html</a> (Jun. 28, 2012).
- See Robert Kovacik and John Simerson, LAFD Deployment Plan Under Fire, http://www.nbclosangeles.com/news/local/LAFD-Deployment-Plan-Under-Fire-140979723.html (Mar. 4, 2012).
- See LA Fire Department Response Time Lags After Budget Strain, http://www.scpr.org/blogs/news/2012/03/01/4900/lafds-response-time-lags-after-cuts-nbc-la-reports/ (Mar. 1, 2012).
- See Gordon Tokumatsu and Kristopher Li, Video: Audit: Up to 20 Seconds Added to Emergency ResponseTimes, <a href="http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/Audit -Up-to-20-Seconds-Added-to-Emergency-Response-Times/152114345">http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/Audit -Up-to-20-Seconds-Added-to-Emergency-Response-Times/152114345</a> (May 18, 2012).
- See Video: Leon Prepares for the Pope, <a href="http://www.nbclosangeles.com/video/#!/news/top-stories/video-override/Leon-Prepares-for-the-Pope/144022766">http://www.nbclosangeles.com/video/#!/news/top-stories/video-override/Leon-Prepares-for-the-Pope/144022766</a> (Mar. 23, 2012); Janet Kwak and Bobbie Eng, Video: LA Catholics Follow Pope's Trip to Mexico, <a href="http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/LA-Catholics-Follow-Popes-Trip-to-Mexico/144112836">http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/LA-Catholics-Follow-Popes-Trip-to-Mexico/144112836</a> (Mar. 24, 2012); John Cádiz Klemack, Edwin Calderon, and Sergio LeLevier, Video: Pope Benedict Sends Message of Peace to Children of Mexico, <a href="http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/Pope-Benedict-Sends-Message-of-Peace-to-Children-of-Mexico/144126585">http://www.nbclosangeles.com/video/#!/on-air/as-seen-on/Pope-Benedict-Sends-Message-of-Peace-to-Children-of-Mexico/144126585</a> (Mar. 24, 2012).
- See Erika Aguilar, Mexico Gets a Visit from a Pope for 1st Time in a Decade, http://www.scpr.org/news/2012/03/22/31757/pope-benedict-xvi-visit-mexico-three-days/ (Mar. 22, 2012); Jason Beaubien, Pope Expected to Address Drug Violence in Mexico, http://www.scpr.org/news/2012/03/23/31767/pope-expected-to-address-drug-violence-in-mexico/ (Mar. 23, 2012); Erika Aguilar, Pope Benedict XVI Visits Mexico, Denounces Drug-Related Violence, http://www.scpr.org/news/2012/03/23/31780/pope-benedict-xvi-visits-mexico-denounces-drug-rel/ (Mar. 23,2012).

# PROGRESS REPORT



# Comcast PEG Pilot Program

# **Progress Report**

July 30, 2012

# PIEIG Pilot Program

Progress report on the PEG Video On Demand and Online platforms

**July 2012** 





# P'E'G Pilot Program Status Report

For the period of January 28, 2012 through July 28, 2012

This report describes the progress of Comcast's pilot program to host Public, Educational, and Governmental ("PEG") content on its Video On Demand ("VOD") and On Demand Online ("Online") platforms, consistent with the commitments and benchmarks set forth in Condition XIV.4 of Appendix A (the "Condition") to the Comcast-NBCUniversal Order. Comcast branded this initiative **Project Open Voice** (www.projectopenvoice.com).

Previous progress reports<sup>2</sup> described how Comcast met each of the following benchmarks:

Benchmark	Deadline	Result
Announce the final location of the five pilot communities	Feb. 28, 2011 <sup>3</sup>	Announced the selection of Fresno, CA; Hialeah, FL; Houston, TX; Peterborough, NH; and Philadelphia, PA as the five trial communities. <sup>4</sup>
Initiate VOD placement of available PEG programming in each PEG pilot community	Oct. 28, 2011 <sup>5</sup>	Created VOD folders accessible to Comcast video customers in each of the pilot communities, and uploaded content submitted by PEG programmers selected by each community to participate in the trial.

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, 26 FCC Rcd 4238 (2011) (as amended by an Erratum released on March 9, 2011).

See Condition XIV.4.c.ii ("within nine months of the Closing of the Transaction").



See Letters from Lynn R. Charytan, Vice President, Legal Regulatory Affairs, Senior Deputy General Counsel, Comcast Corporation, to Marlene H. Dortch, Secretary, Federal Communications Commission, MB Docket No. 10-56, dated July 28, 2011 and January 30, 2012, respectively. Copies of the reports are also available at www.comcast.com/PEG.

See Condition XIV.4.c.i ("within 30 days of the Closing of the Transaction").

The sixth site —Medford, Massachusetts— participates as a "trial" market that is used by Comcast to develop and test the PEG pilot platforms before rolling them out in the other communities.

Benchmark	Deadline	Result
Initiate Online placement of available PEG programming in each PEG pilot community through existing or newly created online platforms	Jan. 28, 2012 <sup>6</sup>	Designed, built, and launched custom websites to act as video streaming portals for PEG and other local content.

Updates on the progress of the platform launch benchmarks are provided in Sections I and II, below.

Comcast is also pleased to report that it has initiated marketing support of the VOD and Online platforms in each community, satisfying the requirement to do so within 18 months of the closing of the Comcast-NBCUniversal transaction (i.e., by July 28, 2012). As described in Section III, below, Comcast has been working in tandem with each pilot community to promote Project Open Voice.

# I. Progress of the PEG VOD Platform

Dedicated Project Open Voice VOD content folders are up and running on the Comcast cable systems serving each of the pilot communities. These folders contain the PEG content selected by the communities for placement on the VOD platform. Each community's VOD content can be refreshed as often as the community or its designated PEG programmers want.8

Comcast also created a consistent VOD folder path that is designed to ensure that consumers in the pilot communities can readily find and access the PEG VOD content:

# Get Local > [Name of the Project Open Voice Brand Chosen by Each Community] > [Content Folder Name] > [Content Name]

Local Comcast VOD teams continue to work closely with designated PEG content managers to support each city's VOD folder management needs. For example, Comcast assists the city's designated PEG programmers in making sure each video is in a format compatible with Comcast's VOD platform, and once the content files are in the correct format, Comcast uploads the content to the local VOD storage facility.

The communities have made good use of the local VOD folders since the October 2011 launch. As part of the promotional ramp-up for the pilot platforms, Comcast is working with the communities to reorganize their VOD folders to better match the names of content categories and



See January 2012 progress report, supra n. 2, at 3.

See Condition XIV.4.c.iii ("within one year of the Closing of the Transaction").

See Condition XIV.4.c.iv ("within 18 months of the Closing of the Transaction").

providers seen on the pilot websites. This approach better aligns VOD with the website brands and allows Comcast video subscribers in the pilot communities to view the most compelling content from the websites on the VOD platform. Additionally, this alignment will allow Comcast to market and promote Project Open Voice as a multi-platform destination for PEG and hyper-local content.

# II. Progress of the PEG Online Platform

As reported in the January 2012 progress report,<sup>9</sup> Comcast successfully launched the beta versions of the pilot websites to distribute PEG and other local content on the Internet. Launched as beta versions in January 2012, development and beta testing of all websites is now complete.

Each website has a unique look and feel in accordance with the brand and theme chosen by the community.<sup>10</sup>



The sites act as portals to a mix of traditional PEG material and other hyper-local content selected by the individual partner community. Videos are organized by "channels" created by the community or its authorized content partners. Though the content and layout varies per website, all sites feature community content like announcements, event calendars, and tourism information.

Comcast designed the platforms to make it very easy for a broad array of content providers to register to provide their material for the platform. Each content partner receives access to a video management "dashboard" that allows the partner to upload, maintain, and even

A website was also created for the Medford trial market (<u>www.madeinmedford.com</u>).



See id. at 3-4.

promote its contributions to the site. Content partner registration is free and only requires the completion of an online application form<sup>11</sup> and adherence to the Content Partner Guidelines.<sup>12</sup> Access to the content partner dashboard is granted as soon as the third-party website administrator approves the content partner's application. This easy mechanism should produce an even broader array and larger amount of content as word spreads about the benefits of the platform.

As the statistics in Section III (below) demonstrate, the online platforms have been very popular and the launch has been a clear success. As of July 15, 2012, 12 linear PEG content providers and 186 other content partners in the pilot communities have created streaming channels for PEG or other hyper-local content on the websites. These content providers have collectively uploaded more than 1,145 streaming videos to the Project Open Voice websites since the January 2012 beta test launch.

# **Site Content Highlights**

Below are some content highlights from each of the pilot communities' websites:

### **Gotta Love Fresno**

Gotta Love Fresno is the leading platform for Swede Fest (<a href="http://www.gottalovefresno.com/swedefest">http://www.gottalovefresno.com/swedefest</a>), a local festival dedicated to low-budget movie remaking. In addition, Fresno Mayor Ashley Swearengin suggested that the Fresno website include a Visiting Fresno section (<a href="http://www.gottalovefresno.com/visitfresno">http://www.gottalovefresno.com/visitfresno</a>) for tourism. This idea caught on, so the Project Open Voice team included a tourism section on the other pilot community websites.

# ¡Yo Soy! Hialeah

The City of Hialeah is driving the strategy behind getting the word out about Yo Soy Hialeah. The City is currently launching a youth initiative to empower young residents to put their stories to video. Yo Soy Hialeah will be the official platform for the city in this effort.

### **Houston's Voice**

The local Houston management agency runs regular workshops on creating video and marketing. One partner, CultureMap (<a href="http://houstonsvoice.com/?partner=CultureMap-Hidden+Houston">http://houstonsvoice.com/?partner=CultureMap-Hidden+Houston</a>), uses Houston's Voice as a destination to discover local cultural happenings.

### **Philly in Focus**

The Greater Philadelphia Cultural Alliance (<a href="http://www.phillyinfocus.com/channel/philaculture/">http://www.phillyinfocus.com/channel/philaculture/</a>), an umbrella arts

The Content Partners Guidelines can be found at http://www.projectopenvoice.com/content-partner-guidelines/.



See, e.g., www.gottalovefresno.com/partnersignup/.

organization, uses Philly In Focus as an outlet not only for its videos, but also for its members. Also, the City of Philadelphia's various offices use the platform for hosting everything from press announcements to a concert featuring renowned hip-hop artist Jay-Z.

# **Local Look Peterborough**

Local businesses and the Greater Peterborough Chamber of Commerce (<a href="http://www.locallookpeterborough.com/chamberofcommerce">http://www.locallookpeterborough.com/chamberofcommerce</a>) participate in regularly held "birds-of-a-feather" workshops that show local groups how to use video to share their stories. The products of these workshops are often uploaded to the website, and they help add valuable content that other community members can then access.

# **III. Marketing Support for Project Open Voice**

As detailed in the attached Exhibit, Comcast has already committed significant resources to promote awareness of the pilot platforms. From hosting launch events, to implementing strategies developed by advertising agencies with local expertise, Comcast has provided the funding and logistical support required to develop effective communication strategies for each test market.

# **Community Relations and Content Partner Support**

Project Open Voice's marketing efforts have primarily focused on attracting PEG providers and other local sources to serve as content partners to both the VOD and Online platforms. As discussed above, these direct outreach and communication efforts have encouraged 198 content partners to sign up for the Online platforms, a significant benchmark considering that the average content provider targeted by the pilot program is typically a small producer with limited resources to generate content. Other metrics point to the early success of the marketing strategy. Project Open Voice and the local websites have:

- Collectively received more than 75,000 unique visitors.
- Achieved a rate of nearly 50% of visitors returning to a selected Project Open Voice site within one week.
- Tapped into a network of nearly 1 million people, which includes the total number of web, e-mail, and social media connections of the 198 content partners.
- Gained a social media following of nearly half a million people outside of the Project Open Voice network.<sup>13</sup>



This includes the Facebook "Friends of Friends" metric, which is a standard data point in the Facebook Insights analytics platform.

# **Additional Strategies to Promote Awareness**

Comcast engaged advertising agencies in each pilot market and tasked them with advising the communities on promoting awareness of the Project Open Voice websites. Project Open Voice team members hold bi-weekly calls with each local advertising agency to review marketing and performance progress, and they regularly visit each market to meet with both local agencies and content partners. The Comcast team also holds monthly calls during which the agencies and content partners speak directly to each other and can share ideas, challenges, and successes.

In the coming months, Comcast will implement a five-tier marketing strategy including the following components:

Strategy	Objectives
Continued Community Relations	<ul> <li>Establish marketing partners in each pilot community.</li> </ul>
Expanded Social Media	<ul> <li>Focus on the use of Facebook, Twitter and YouTube.</li> </ul>
Mobile Solutions	<ul> <li>Optimize all websites for viewing on smartphones and tablets.</li> <li>Leverage location-based tools like "QR" codes to direct users to Project Open Voice content.</li> </ul>
Search Engine Optimization & Marketing (SEO/SEM)	<ul> <li>Promote consistency and best practices in the use of search terms and other SEO strategies across all markets.</li> </ul>
Strategic Support	<ul> <li>Leverage word-of-mouth through partner networks.</li> <li>Drive cross-promotion on Comcast-NBCUniversal platforms (see below).</li> </ul>

### **Cross-Promotion on Comcast Platforms**

Comcast will continue to use existing media venues to cross-promote both the VOD and Online aspects of the program. Examples of these efforts to date include:

# **Syndication to Xfinity.com**

Starting with the Philadelphia market, Comcast is currently experimenting with ways to feed video content from the Philly in Focus website to the local section of Xfinity.com (<a href="http://xfinity.comcast.net/local/">http://xfinity.comcast.net/local/</a>).

### **Telescoping Ads for VOD**

Comcast is working with its National Fulfillment Center to run promotional spots on local networks. Each spot will give a local brand overview and use telescoping technology to drive viewers directly to VOD.



# **Cross-syndication with Everyblock from NBCNews.com**

EveryBlock (<u>www.everyblock.com</u>), an NBCNews.com property, is a combination of many different types of local news —from public records like crime reports, to neighbor discussions, to photos people have taken in their neighborhoods. Beginning with Philadelphia, Everyblock will run geo-targeted video content supplied by the local Project Open Voice website.





# **EXHIBIT**



(comcast,

# Project Open Voice Launch Event Summary

Pilot Market	Launch Press Conference Details	Marketing Plan Highlights
Houston, TX	<ul> <li>Held on Feb. 28, 2012 at Houston City Hall with Mayor Annise Parker in attendance.</li> <li>English and Spanish-language media covered the event, including the <i>Houston Chronicle</i>.<sup>1</sup></li> <li>Mayor Parker introduced project and answered all questions.</li> </ul>	<ul> <li>Regular contests held for video content.</li> <li>Users can sign up for a weekly e-mail newsletter to learn of new videos and upcoming events.</li> </ul>
Fresno, CA	<ul> <li>Held on Mar. 20, 2012 in downtown Fresno.</li> <li>Event featured an on-site content partner showcase with providers displaying their channels on laptops for attendees.</li> <li>Mayor Ashley Swearengin met with the content partners for nearly an hour.</li> <li>Earned media coverage included KSEE 24 News.<sup>2</sup></li> </ul>	<ul> <li>Social media is a specialty of the Fresno marketing agency (e.g., Tweet Ups feature local bands).</li> <li>The website encourages visitors to record themselves "talking up" Fresno.</li> <li>Regular highlights of new and existing content are featured on the site, VOD, and through regular e-mail updates to users.</li> </ul>
Philadelphia, PA	<ul> <li>Held on Apr. 3, 2012 at PhillyCAM (Philadelphia Community Access Media) with Mayor Michael Nutter in attendance.</li> <li>Event featured an on-site content partner showcase with providers displaying their channels on laptops for attendees.</li> <li>Earned media coverage by The Philadelphia Tribune, NBC 10 Philadelphia, CBS 3 Philadelphia, and several local websites.<sup>3</sup></li> </ul>	<ul> <li>Philadelphia team led the concept of a content partner toolkit, which includes a publisher's handbook and best practices.</li> <li>Tutorials provide best practices to content partners.</li> <li>Leverages community connections to spread the word about partner organizations.</li> </ul>
Hialeah, FL	<ul> <li>Held on April 5, 2012 at the Walker Community Center with Mayor Carlos Hernandez in attendance.</li> <li>Event featured an on-site content partner showcase with providers displaying their channels on laptops for attendees.</li> <li>Earned media coverage by all the major local television stations, including Univision 23, Telemundo 51, CBS 4, and NBC 6. <i>El Nuevo Herald</i> also covered the event.<sup>4</sup></li> </ul>	<ul> <li>Conduct roundtable discussions on topics ranging from social media practices to business communication strategies.</li> <li>Exploring several possibilities for content partnerships with community newspapers.</li> <li>Working closely with the City of Hialeah on unique marketing opportunities, such as inserts in utility bills.</li> </ul>
Peterborough, NH	<ul> <li>Held on July 23, 2012 in Downtown         Peterborough with two members of the         town's Board of Selectmen and city staff in         attendance.</li> <li>Event included all of the content partners.</li> </ul>	<ul> <li>Site built out with a variety of creative content, since it is a small rural market with a very active arts community.</li> <li>Partnerships with local theaters, galleries, and museums to help spread the word about the site.</li> </ul>

See Chris Moran, *Houston Gets Its Own Internet Channel*, <a href="http://www.chron.com/news/houston-texas/article/Houston-gets-its-own-web-channel-3365408.php">http://www.chron.com/news/houston-texas/article/Houston-gets-its-own-web-channel-3365408.php</a> (Feb. 27, 2012).

See KSee News: Mayor Helps Kick Off 'Gotta Love Fresno' Website, <a href="http://www.ksee24.com/news/local/Mayor-Helps-Kick-Off-Gotta-Love-Fresno-Website-143538866.html">http://www.ksee24.com/news/local/Mayor-Helps-Kick-Off-Gotta-Love-Fresno-Website-143538866.html</a> (Mar. 20, 2012).

See, e.g., Ayana Jones, Online Video Service Puts Philly In Focus, http://www.phillytrib.com/newsarticles/item/3555-online-video-service-puts-philly-in-focus.html (Apr. 6, 2012); Lou Dubois, Philadelphia Launches Local, Community-Driven Video Site, http://www.nbcphiladelphia.com/news/tech/Philadelphia-Launches-Local-Community-Driven-Video-Site-145979995.html; John Ostapkovich, Comcast Making Philadelphia's Public Access Programming More Widely Available, http://philadelphia.cbslocal.com/2012/04/03/comcast-making-philadelphias-public-accessprogramming-more-widely-available/ (Apr. 3, 2012).

See Enrique Flor, Hernández Anuncia Website Dedicado a Hialeah, http://www.elnuevoherald.com/2012/04/09/1173685/hernandez-anuncia-website-dedicado.html (Apr. 9, 2012).

WWW.COMCAST.COM/PEG WWW.PROJECTOPENVOICE.COM



