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Suite 700
Washington, DC 20001

January 31, 2020

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Expanding Flexible Use of the 3.7 to 4.2 GHz Band, GN Docket No. 18-122;*
*Unlicensed Use of the 6 GHz Band, ET Docket No. 18-295***

Dear Ms. Dortch:

On January 30, 2020, Margaret Tobey, David Don and Brian Josef of Comcast Corporation, met with Will Adams of the Office of Commissioner Brendan Carr and William Davenport of the Office of Commissioner Geoffrey Starks. On January 31, 2020, David Don and Brian Josef met with Nicholas Degani and Aaron Goldberger of the Office of Chairman Ajit Pai.

During the meetings, we discussed the pending C-Band and 6 GHz rulemaking proceedings. We noted our multiple interests in these proceedings and understanding of the challenges before the Commission as it balances many legitimate operational interests and policy goals to be resolved. A copy of the presentation addressing the C-Band proceeding and used in the meetings is attached.

In the 6 GHz rulemaking, we explained that the Commission can and should authorize low power, indoor use ("LPI") throughout the band without the need for AFC coordination. We noted the studies and analyses in the record that support such an authorization. Further, we explained that our engineers have worked, and continue to work, closely to address their shared goal of an outcome that enables LPI Wi-Fi services while preserving existing uses, including electronic newsgathering services in portions of the band.

Please direct any questions to the undersigned.

Respectfully Submitted,

/s/ David M. Don

David M. Don

Comcast Corporation

cc: Nicholas Degani
Aaron Goldberger
William Davenport
Will Adams



Ensuring a Successful C-Band Transition

January 2020

Ensuring A Successful C-Band Transition

- Require the C-Band Alliance (“CBA”) to fulfill its transition-related commitments necessary to protect video quality.
- Establish a broad-based, multi-stakeholder group to develop a comprehensive interference protection framework that fully addresses interference prevention, detection, mitigation, and enforcement.
- Preserve guaranteed access to the remaining 200 megahertz of C-Band spectrum for continued FSS use.
- Ensure the continuity of video delivery and foster the introduction of new services by requiring full compensation for earth station transition costs.

Fulfilling C-Band Alliance Commitments

- CBA has redoubled efforts to provide Comcast/NBCUniversal with firm, detailed commitments that demonstrate it can coordinate a clearing and repack of video services that ensures Americans continue to receive unimpaired video content from Comcast/NBCUniversal.
- In addition to its prior commitments on the record (including provision of filters, new satellites, etc.), CBA specifically has committed to:
 - Accommodating all existing NBCUniversal, NBC Broadcast, Telemundo, Comcast Content Services, and HITS services during and after the two-tranche transition;
 - Requiring no technology upgrades, with the exception of the HITS service, on a 36-month timeline and at data rates acceptable to Comcast/NBCUniversal; and
 - Reducing HITS and Comcast Content Services transponders to an acceptable number.

Fulfilling C-Band Alliance Commitments (cont'd)

- The FCC should set forth an enforceable mechanism to ensure CBA and its member companies fulfill their on-the-record commitments and those made directly to their customers, which, if met, would maintain the video quality Comcast/NBCUniversal and its customers require.
- CBA must be engaged, incentivized, and compensated to participate in ensuring a smooth transition and unimpaired video operations during and after the transition.

Establishing Multi-Stakeholder Group to Develop Interference Protections

- CBA's proposed technical rules are important to address interference, and the FCC should adopt them – but these rules are insufficient on their own.
- The FCC should:
 - Encourage interested stakeholders to convene a broad-based group to develop a comprehensive framework for addressing interference prevention, detection, mitigation, and enforcement; and
 - Condition commencement of MBX operations on joint approval (Wireless Telecommunications Bureau, International Bureau, and Office of Engineering and Technology) of this multi-stakeholder group's consensus recommendations and path for implementation.
- If there is no consensus, the FCC itself should take follow-on actions to address incumbent protections.

Ensuring FSS Access to Remaining 200 Megahertz

- The FCC should make clear that it will not propose to reallocate any additional C-Band spectrum beyond 300 megahertz.
- The remaining 200 megahertz will be critical to continuing and future innovative video operations.

Fully Compensating Earth Station Transition Costs

- Accommodating incumbents ensures continuity while fostering the introduction of new services.
- C-Band registered earth station operators should be made whole.
- The FCC has clear Title III authority for FCC to protect earth station registrants by compensating their costs.