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October 22, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20544

Re: *Applications of T-Mobile US, Inc. and Sprint Corporation, Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations, WT Docket No. 18-197*
REDACTED – FOR PUBLIC INSPECTION

Dear Ms. Dortch:

Pursuant to the Commission’s October 3, 2018 letter (“Letter”),¹ Comcast Corporation (“Comcast”) hereby submits the redacted, public version of its responses to Requests 2 and 3 of the Commission’s October 3, 2018 Information and Document Request.² The {{ }} symbols denote where Highly Confidential Information has been redacted. Pursuant to the terms of the Protective Order in this proceeding³ and instructions in the Letter, the Highly Confidential version of this filing has been submitted to the Office of the Secretary, with copies also submitted to Kathy Harris of the Wireless Telecommunications Bureau. The Highly Confidential version of this filing will be made available for inspection pursuant to the terms of the Protective Order.

Requests for the Highly Confidential version of this submission should be directed to Samuel Eckland of Willkie Farr & Gallagher ((202) 303-1214 or seckland@willkie.com).

¹ See Letter from Donald J. Stockdale, Jr., Chief, Wireless Telecommunications Bureau, to Kathryn A. Zachem, Comcast Corporation, WT Docket No. 18-197 (Oct. 3, 2018).

² *Id.*

³ See *Applications of T-Mobile US, Inc. and Sprint Corporation, Consolidated Applications for Consent to Transfer Control of Licenses and Authorizations*, Protective Order, WT Docket No. 18-197, DA 18-642 (June 15, 2018) (“Protective Order”).

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Ms. Marlene H. Dortch
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Please contact the undersigned should you have any questions regarding this submission.

Respectfully submitted,



Michael D. Hurwitz
Counsel for Comcast Corporation

cc: Kathy Harris
Linda Ray
Kate Matraves
Jim Bird
David Krech

Enclosures

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**RESPONSES OF COMCAST CORPORATION TO THE
COMMISSION’S OCTOBER 3, 2018 INFORMATION AND DOCUMENT REQUEST**

- 2. Describe in detail how the Proposed Transaction could impact the Company’s mobile wireless business.**

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¹ **{{(BEGIN HIGHLY CONFIDENTIAL)}}**

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3. Describe in detail how the Proposed Transaction could impact the Company’s television and/or internet provision businesses.

Comcast is closely monitoring developments in 5G and is aware of prognostications by various wireless providers (including the Applicants) that, with the advent and wide-scale deployment of 5G technology in the years ahead, they will be able to provide high-speed fixed wireless broadband and video services via 5G on a national basis, including within Comcast’s footprint.

Over the past several years, Comcast has invested significantly in improving its broadband network. Among other things, we have rolled out DOCSIS 3.1 and increased network resilience and service reliability. Just last week, we announced that our fastest-speed Gigabit Internet service now reaches more homes than any other provider in the United States after we completed rollout to nearly all 58 million homes and businesses we serve.³ Comcast also has offered a number of innovative services including xFi, advanced network gateways, and (as discussed above) Xfinity Mobile service. Comcast has and is continuing to make these investments because of the intense competition we face today, including from telco wireline broadband providers, cable and fiber overbuilders, and wireless operators using powerful 4G LTE and other broadband-capable technologies and networks. But these same investments also help prepare us to address future competition in the form of fixed wireless 5G networks, more robust satellite broadband, etc.

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³ See Reuters, *Comcast Says Its Fastest Internet Reaches More U.S. Homes Than Any Other Provider*, Oct. 18, 2018, <https://www.reuters.com/article/us-comcast-broadband/comcast-says-its-fastest-internet-reaches-more-u-s-homes-than-any-other-provider-idUSKCN1MS2XY>.

⁴ **{{BEGIN HIGHLY CONFIDENTIAL}}**

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With respect to the marketplace for multichannel video services, Comcast today faces intense competition from a number of multichannel video programming distributors (“MVPDs”) and virtual MVPDs, as well as numerous other sources of video content that are competing for our customers’ time and attention. Comcast notes that, when T-Mobile announced its acquisition of Layer3 TV on December 13, 2017, T-Mobile CEO John Legere stated that T-Mobile’s plans for a 5G broadband service, bundled with an in-home multichannel video service to “disrupt the legacy TV model,” did not depend on a merger with Sprint. **{{BEGIN HIGHLY CONFIDENTIAL}}**

{{END HIGHLY CONFIDENTIAL}}. In any event, Comcast already faces significant competition from numerous players today (including those, like DirecTV Now, that are already affiliated and bundled with a mobile wireless broadband service (AT&T)). It is difficult to predict with any certainty how the video programming and distribution marketplace will evolve or what it will look like several years from today. But we are continuing to invest substantially in our video services to provide attractive bundles of content at attractive prices, with greater functionality and mobility via our innovative X1, Xfinity Stream, and Xfinity Instant TV platforms.

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