

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
beIN SPORTS, LLC,)	
<i>Complainant,</i>)	
)	MB Docket No. 18-90
vs.)	File No. CSR-8954-P
)	
COMCAST CABLE)	
COMMUNICATIONS, LLC)	
And)	
COMCAST CORPORATION,)	
<i>Defendants.</i>)	

OPPOSITION AND RESPONSE

For the record, Comcast briefly responds to beIN’s Motion to File and accompanying Letter submitted on August 1, 2018 (“Motion”).¹ beIN has not provided any new record information, much less “impeaching” information of any “decisional significance” sufficient to make a showing of “extraordinary circumstances” required by 47 C.F.R. § 76.7(d).

The information that Comcast is providing to its customers about the availability of soccer programming on other networks that Comcast carries is already part of the record in this proceeding. Comcast’s Answer and exhibits make clear that Comcast carries an array of soccer programming on a number of unaffiliated networks, such as on ESPN, ESPN2, ESPN Deportes, Fox Deportes, FS1, and Univision Deportes, as well as on affiliated networks.² And, as Comcast

¹ See beIN Motion To File Letter of Decisional Significance and Letter from Pantelis Michalopoulos, Steptoe & Johnson LLP, Counsel to beIN Sports, to Marlene Dortch, Secretary, FCC, MB Docket No. 18-90 (Aug. 1, 2018).

² See, e.g., Comcast Answer ¶ 4 & n.3 (“Comcast provides an array of other soccer programming to its customers, including from multiple unaffiliated cable networks that it distributes broadly (e.g., ESPN, ESPN2, and FS1 on DS) and on specialty tiers (e.g., ESPN Deportes, Fox Deportes, and Univision Deportes on the H tier as well as other tiers.”); *id.* ¶ 63 (same); Brayford Decl. ¶ 40 (same); Smith Decl. ¶ 9 (same); Lerner Decl. ¶ 62 n.70 (same).

has argued from the start, the fact that there are soccer games on a network does not make beIN's networks comparable to that network.³

Nor has Comcast "launched a campaign against beIN," as the Motion falsely claims. Comcast is simply communicating with its customers about the drop of beIN programming, consistent with FCC regulations, and trying to help its customers by informing them when they try to tune to the beIN networks of the continued availability of the wide array of soccer programming available on other networks.

Respectfully submitted,



Lynn R. Charytan
Francis M. Buono
Ryan G. Wallach
COMCAST CORPORATION
Comcast Center
1701 JFK Boulevard
Philadelphia, PA 19103
(215) 665-1700

Michael D. Hurwitz
David P. Murray
Melanie A. Medina
WILLKIE FARR & GALLAGHER LLP
1875 K Street, N.W.
Washington, DC 20006-1238
(202) 303-1000

*Attorneys for Comcast Corporation and Comcast
Cable Communications, LLC*

August 2, 2018

³ Moreover, the record makes clear that, even apart from multiple other factors distinguishing NBCSN and Universo from the beIN networks, NBCSN and Universo air only a small fraction of the amount of soccer programming on the beIN networks. *See, e.g.*, Comcast Answer ¶¶ 23-31; *see also id.* ¶¶ 32-55. Among other things, Dr. Lerner's similarly situated analysis showed that soccer programming accounted for 55.1 and 72.3 percent of all programming minutes on beIN Sports and beINE, respectively, whereas only 9.9 and 5.5 percent of NBCSN and Universo's total programming minutes, respectively, were soccer programming. *Id.* ¶ 28.

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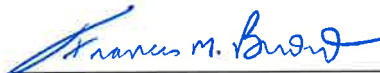
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DECLARATION OF FRANCIS M. BUONO

1. My name is Francis M. Buono. I am Senior Vice President, Legal Regulatory Affairs, and Senior Deputy General Counsel for Comcast Corporation (collectively, with Comcast Cable Communications, LLC, "Comcast").

2. I have read Comcast's Opposition and Response and to the best of my knowledge, information, and belief formed after reasonable inquiry, it is well grounded in fact and is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law; and it is not interposed for any improper purpose.

Dated: Washington, DC
August 2, 2018



Francis M. Buono

CERTIFICATE OF SERVICE

I, Melanie A. Medina, certify that on this 2nd day of August 2018, I caused true and correct copies of the foregoing Opposition and Response to be electronically filed with the Commission this day, and served by electronic mail on the following:

Pantelis Michalopoulos
Stephanie Roy
STEPTOE & JOHNSON LLP
1330 Connecticut Ave, N.W.
Washington, DC 20036
(202) 429-3000
pmichalopoulos@steptoe.com
sroy@steptoe.com
Counsel to beIN Sports, LLC


Melanie A. Medina

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