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September 11, 2017

VIA ELECTRONIC FILING

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

**Re: *Rate-of-Return Study Areas Potentially 100 Percent Overlapped by
Unsubsidized Competitors, WC Docket No. 10-90***

Dear Ms. Dortch:

Comcast Corporation (“Comcast”) hereby responds to the Public Notice seeking confirmation that unsubsidized competitors offer fixed broadband and voice service in accordance with the Commission’s service obligations to all locations within census blocks that overlap certain rate-of-return incumbent local exchange carrier (“LEC”) study areas.¹ The Wireline Competition Bureau (“Bureau”) has made a preliminary determination that Comcast Cable Communications, LLC, in conjunction with another competitor, provides 100 percent overlapping coverage of one study area served by a rate-of-return incumbent LEC – “Monon Tel Co.”

Comcast affirms that it provides broadband service satisfying the Commission’s performance standards in each census block that is part of the study area the Bureau identified Comcast as serving. Comcast, however, does not claim that it offers broadband service to every location within each of the census blocks that comprise the relevant study area. Comcast also cannot affirm that it provides voice service satisfying the Commission’s performance standards throughout the study area.

This limited affirmation is fully consistent with Comcast’s Form 477 filings. As the Public Notice points out, the Bureau is “mindful of the fact that, while a Form 477 filer may truthfully certify that it offers service in a particular census block, the filer may not offer service to all locations in that census block” because “a Form 477 filer is required to report service even

¹ *Wireline Competition Bureau Publishes and Requests Comment on Rate-of-Return Study Areas Potentially 100 Percent Overlapped by Unsubsidized Competitors*, Public Notice, WC Docket No. 10-90, DA 17-760 (rel. Aug. 11, 2017).

if in a given block it offers service to only a fraction of the residential and business locations.”²
In addition, interconnected VoIP subscription data is reported on FCC Form 477 at the census tract and state levels, rather than at the more granular census block level.³

If you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Beth Choroser

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² *Id.* ¶ 7.

³ See FCC Form 477 Instructions at 19, 22-23, <https://transition.fcc.gov/form477/477inst.pdf>.