

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

In re Petition of)
)
Entravision Holdings, LLC) CSR-8944-A
)
For Modification of the Television Market)
For Station WJAL(TV), Silver Spring, Maryland)

TO: The Secretary
Attn: Chief, Media Bureau

**MOTION FOR LEAVE TO AMEND TO SUBMIT
VERIFICATION, TABLE OF CONTENTS, AND SUMMARY**

Comcast Cable Communications, LLC, on behalf of its subsidiaries and affiliates, including Comcast of Maryland, LLC, Comcast of Potomac, LLC, Comcast of Virginia Inc., and Comcast of the District, LLC (individually and collectively, "Comcast") timely submitted its Opposition in the above-referenced proceeding on December 4, 2017. Petitioner's Reply notes that Comcast did not include a verification, table of contents, and succinct summary. Counsel for Comcast regrets the inadvertent oversight. Comcast is filing herewith the identified material in Attachment A and respectfully submits that it is in the public interest for the Commission to accept the supporting material and consider the underlying substance of Comcast's Opposition.

Respectfully submitted,

Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates

By: _____

Steven J. Horvitz

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December 18, 2017

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Attachment A

VERIFICATION PURSUANT TO 47 C.F.R. § 76.6(a)(4)

The below-signed signatory has read the Opposition to Petition for Special Relief, 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 is not interposed for any improper purpose.

Respectfully submitted,

Comcast Cable Communications, LLC
on behalf of its subsidiaries and affiliates

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SUMMARY

Entravision received \$25.5 million to vacate the original channel allocation of WJAL(TV), Hagerstown, MD, and entered into a Channel Sharing Arrangement (“CSA”) with WUSA(TV), Washington, DC. Based on the new CSA, Entravision now seeks reversal of a market modification decision issued by the Commission in 2003, which expressly denied WJAL carriage in the very communities where it now seeks must-carry rights. Entravision seeks these must-carry rights despite the fact that – contrary to the claims and evidence submitted in its Petition – WJAL broadcasts the same programming that currently is broadcast by another Entravision station that Comcast already carries in the Cable Communities.

Entravision’s request is premised almost entirely on the new signal contour that WJAL claims it will enjoy under its CSA with WUSA. Indeed, the Petition asks the Commission to disregard every statutory factor other than signal contour in evaluating Entravision’s market modification request. In so doing, WJAL effectively concedes that it fares poorly under each of those factors. Moreover, reversing the Comcast Order based on the signal contour factor alone would be particularly inappropriate in this case -- given the absence of any local programming nexus between WJAL and the Cable Communities.

Denial of the Petition is particularly warranted because it involves channel sharing arrangements that did not exist when the current must carry regime was created by Congress and implemented by the Commission. If the Commission were to grant the Petition in this new context, it would unjustifiably encourage broadcasters to manipulate the Commission’s authorization of CSAs under the Incentive Auction by vacating their broadcast allocations in order to expand must-carry rights, through a CSA, far beyond those associated with its original spectrum allocation.

CERTIFICATE OF SERVICE

I, Nichele Rice, do hereby certify on this 18th day of December, 2017, that a true and correct copy of the foregoing "Motion For Leave To Amend To Submit Verification, Table of Contents, And Summary" has been sent via U.S. mail, postage prepaid to the following:

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