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November 14, 1997

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Mr. William F. Caton  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: **Reply Comments of Comcast Corporation** in the Matter of the Petition of Consumers Union and Consumer Federation of America to Update Cable Television Regulations and Freeze Existing Cable Rates, MM Docket Nos. 92-264/92-265, 92-266; RM No. 9167

Dear Mr. Caton:

On behalf of Comcast Corporation, please accept for filing these Reply Comments to the Comments filed on October 30, 1997 by DirecTV, Inc. in the above-referenced matter. DirecTV's Comments relate solely to the September 23, 1997 program access complaint DirecTV filed against Comcast Corporation, Comcast-Spectacor, L.P. and Philadelphia Sports Media, L.P. d/b/a Comcast SportsNet, which is currently pending before the Commission in case number CSR-5112-P. As set forth in detail in defendants' Answer to and Request for Dismissal of Program Access Complaint (which was filed on October 24, 1997 in CSR-5112-P), defendants vigorously deny the allegations of DirecTV's program access complaint, which are repeated (along with material misrepresentations of fact) in DirecTV's October 30, 1997 Comments. DirecTV's program access complaint is properly before the Commission in CSR-5112-P; DirecTV should not be allowed to use this rulemaking proceeding as another opportunity to adjudicate its complaint. Therefore, in response to DirecTV's Comments, Comcast directs the Commission and all concerned parties to CSR-5112-P, where they will discover that DirecTV's complaint is wholly without merit.

Sincerely,



David J. Wittenstein  
Counsel for Comcast Corporation

cc: Gary M. Epstein  
Paul J. Sinderbrand

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