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November 19, 2014

VIA ELECTRONIC FILING

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

Re: Notice of Ex Parte Communication, *In the Matter of Protecting and Promoting the Open Internet*, GN Docket No. 14-28; *Framework for Broadband Internet Service*, GN Docket No. 10-127

Dear Ms. Dortch:

On November 17, 2014, David Cohen, Lynn Charytan, and the undersigned from Comcast met with Jonathan Sallet and Stephanie Weiner of the Office of General Counsel and Philip Verveer, Senior Counselor to the Chairman, regarding the above-captioned proceedings. Consistent with Comcast's previous submissions in this docket, we discussed the various pitfalls that full Title II reclassification would entail. We emphasized that reclassification would significantly undermine innovation and investment in advanced broadband services. We also noted that reclassifying broadband Internet access service as a "telecommunications service" cannot be justified by the "factual particulars" of the service—as the Supreme Court has said it must be.¹

Please direct any questions regarding this matter to the undersigned.

Respectfully submitted,

/s/ Kathryn A. Zachem
Senior Vice President,
Regulatory and State Legislative Affairs
Comcast

cc: Jonathan Sallet
Stephanie Weiner
Philip Verveer

¹ See *Nat'l Cable & Telecomms. Ass'n v. Brand X Internet Servs.*, 545 U.S. 967, 991 (2005).