

REDACTED – FOR PUBLIC INSPECTION

March 23, 2015

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: *Applications of Comcast Corporation, Time Warner Cable Inc.,
Charter Communications, Inc., and SpinCo for Consent to Assign or Transfer
Control of Licenses and Authorizations, MB Docket No. 14-57***
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Dear Ms. Dortch:

In response to additional questions from Commission staff, Global Strategy Group (“GSG”) prepared the enclosed memorandum, which contains Confidential Information, regarding its survey of broadband users submitted by Comcast Corporation (“Comcast”).¹

Pursuant to the Second Amended Modified Joint Protective Order in this proceeding,² Comcast hereby submits the enclosed redacted, public version of this submission. The unredacted, Confidential version of this filing was submitted to the Office of the Secretary under separate cover and will be made available for inspection pursuant to the terms of the Second Amended Modified Joint Protective Order.

¹ See Letter from Michael D. Hurwitz, Counsel for Comcast Corp., Willkie Farr & Gallagher LLP, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 14-57 (Feb. 19, 2015) (submitting memo and appendix prepared by GSG in response to initial questions from Commission staff). As previously noted, the complete survey results and underlying survey response data were produced by Comcast in response to Request 74(e) of the Commission’s First Information and Data Request, see Letter from Kathryn A. Zachem, Senior Vice President, Regulatory and State Legislative Affairs, Comcast Corp., to Marlene H. Dortch, Secretary, FCC, Response to Request No. 74 and exhibits (Sept. 11, 2014) (attaching Comcast’s Response to the Commission’s Information and Data request), and as part of the backup data supporting the Reply Declaration of Dr. Mark A. Israel, see Letter from Francis M. Buono, Counsel for Comcast Corp., Willkie Farr & Gallagher LLP, to Marlene H. Dortch, Secretary, FCC, MB Docket No. 14-57 (Sept. 29, 2014).

² *Applications of Comcast Corp. and Time Warner Cable Inc. for Consent to Assign or Transfer Control of Licenses and Authorizations*, Second Amended Modified Joint Protective Order, 29 FCC Rcd. 13799 (2014) (“Second Amended Modified Joint Protective Order”).

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Please contact the undersigned should you have any questions regarding this matter.

Respectfully submitted,

/s/ Michael D. Hurwitz

Michael D. Hurwitz

Counsel for Comcast Corporation

Enclosure

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MEMORANDUM

TO: Willkie Farr & Gallagher LLP
FROM: Jef Pollock, James Delorey, and Michelle Woodruff, Global Strategy Group
RE: Additional Information About the GSG Survey
DATE: March 23, 2015

This document responds to questions from the FCC regarding the Global Strategy Group (“GSG”) broadband survey.

1. How was the panel selected for inclusion? Was this done by the demographics of the panel or of each separate panel if multiple panels were used?

ResearchNow uses a “by-invitation-only” methodology to recruit individuals, which has proven to yield the highest level of panel quality and representativeness, and guards against duplication, fraudulent respondents, and professional survey takers. A single panel was used to conduct the survey. This panel was composed of the following demographic breakdown.

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¹ Regions are defined by the U.S. Census.

REDACTED – FOR PUBLIC INSPECTION**2. Why were the quotas set using the characteristics of the general population rather than using the population that has Internet service?**

The population under study was broadband Internet users who are decision-makers about their broadband Internet service. While information is publicly available about the demographics of broadband Internet users, we are not aware of any publicly available information that describes the demographics of broadband Internet users who are decision-makers about their broadband Internet service. Since we did not have information about this particular population, we opted instead to set quotas for the general adult population.

3. Given that quotas were used for the selection of survey respondents, why was weighting needed?

We set initial quotas that we loosened while the survey was being fielded to ensure that it was completed in the five-day period set for the survey. This process involved allowing a modest number (less than 80) of additional respondents to take the survey even though the particular quota cells that they would fall into were already full. This led to the characteristics of the actual survey respondents differing somewhat from the desired characteristics of the adult population for which the quotas were initially set. We used weighting to adjust for these differences. Weighting was also needed to balance out the characteristics of respondents randomly assigned to the different versions of the survey, as discussed on page 11 of the GSG appendix dated 2/19/2015.

4. Explain in more detail the discussion on pages 5-6 of the GSG appendix dated 2/19/2015 concerning the application of some weights to education and income?

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The following text, from page 7 of the GSG appendix dated 2/19/2015, outlines our rationale for applying education and household income weights:

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5. How were panel members recruited? What process is used to recruit and profile panel members?

ResearchNow recruited the panel members. ResearchNow uses a “by-invitation-only” methodology, partnering with a diverse set of globally recognized consumer- and business-focused brands to invite consumers into the panel. The individuals who were invited into the panels have pre-existing

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relationships with the company that invited them. As noted above, this recruitment approach has proven to yield the highest level of panel quality and representativeness, and guards against duplication, fraudulent respondents, and professional survey takers.

ResearchNow selected a random sample of panel members to participate in this survey. As described in footnote 4 on page 3 of the GSG appendix dated 2/19/2015, [[

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6. Are controls in place to guard against multiple responses by an individual to a single survey? How was the ID of a panel member validated?

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7. Are the respondents' primary ISP known? Are respondents' IP addresses associated with the present survey known?

Question 18 of the survey asked respondents "Who is your Internet Service Provider?" We did not collect respondents' IP addresses.

8. What is the maximum, average, and median number of surveys that the respondents of the present GSG survey had completed in 2014? What is their average term on the panel? Were there processes in place at the time of the survey to limit the number of surveys that a panel member can take?

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9. How many of the survey respondents are Comcast or TWC broadband subscribers?

299 of the survey respondents use Comcast Xfinity as their Internet Service Provider. 148 of the survey respondents use Time Warner Cable as their Internet Service Provider.

10. How many of the survey respondents live in Comcast or TWC territories?

We did not ask respondents for their zip code information and thus are unable to determine how many survey respondents live in Comcast or TWC territories.

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11. What is the distribution of respondents by state? What is the fraction of survey respondents in each state that are Comcast and TWC subscribers?

Below is the reported distribution of respondents by state.

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REDACTED – FOR PUBLIC INSPECTION**12. What are the confidence intervals around the reported statistics? What distribution assumptions, if any, were made to compute these intervals?**

While special care was taken to ensure that this survey was demographically representative of the population in question, this survey was conducted using an online opt-in panel rather than a random sampling methodology. Thus, a standard margin of error cannot be calculated for the estimated frequencies reported on the survey, as margin of error calculations depend upon the assumption of random sampling.

13. How long does it take to run the survey? Were multiple panels used to fill the quotas?

The survey fielded for five days, from July 10th to July 14th of 2014. As noted above, only a single panel was used to conduct the survey.

14. What was the response rate for the survey and for each question? How were the response rates calculated? If multiple panels were used, what was the response rate for each panel?

This survey (which, as noted, had a single panel) had a 78% cooperation rate and a 51% adjusted response rate (both of these rates are described in more detail below). Since respondents were required to complete every question in the survey to qualify, the response rate applies for all questions.

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15. How were the omitted responses treated? If omitted responses were imputed, then explain how they were imputed?

The only responses omitted were 287 incomplete surveys. An incomplete survey means a respondent did not provide a valid response to every question on the survey.

16. What criteria, if any, were used for considering the survey complete for a particular respondent?

The survey is considered to be complete if the respondent provided a valid response to every question on the survey.