



300 New Jersey Avenue NW  
Suite 700  
Washington, DC 20001  
www.comcastcorporation.com

June 8, 2015

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: *Ensuring Customer Premises Equipment Backup Power for Continuity of Communications, PS Docket No. 14-174; Technology Transition, GN Docket No. 13-5***

Dear Ms. Dortch,

On June 4, 2015, Beth Choroser and the undersigned of Comcast Corporation, met with Jerry Stanshine, John Healy, Linda Pintro and Brenda Villanueva of the Public Safety and Homeland Security Bureau. The meeting was in response to a request from staff to provide information on the battery backup policies applicable to Comcast's residential voice service, Xfinity Voice.

New Xfinity Voice customers have the option of purchasing a backup battery for their Comcast voice modem for \$35.00 plus \$5.95 for shipping and handling. The price includes battery monitoring and customer notification when batteries are depleted. New Xfinity voice customers receive a welcome kit at installation that explains that the customer will not be able to use the service in an electrical outage without a battery and provides information on how to obtain a battery. Additional information is available on Comcast's website, including details on the battery policy, guidance on installing batteries, and advice on staying connected during a storm. Comcast customers may also choose to purchase a backup battery from a third party supplier. The Xfinity Connect feature also gives our Xfinity Voice Unlimited customers the ability to stay in touch when they are away from home, even during a power outage.

In response to staff's questions, we also discussed whether Comcast customers have shown an interest in having a backup battery for their Xfinity voice service. We explained that, for the year 2014, less than 1% of new Xfinity Voice customers purchased a backup battery. We also explained that, prior to February 2013, Comcast provided all of its voice customers a backup battery for no charge, including monitoring and notification when batteries were depleted. Customers were provided information on how to obtain a replacement battery, at no charge.

Approximately 13% of Comcast's customers obtained the replacement battery after being notified that their existing battery was depleted. Based on this evidence, Comcast concluded that it would be inequitable to require its entire residential voice customer base to support the significant costs of providing backup batteries to all customers when only a small fraction of those customers valued the batteries.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed for inclusion in the public record of the above reference proceeding.

Respectfully submitted,

/s/ Mary McManus  
Mary McManus

Cc: John Healy  
Linda Pinto  
Jerry Stanshine  
Brenda Villanueva