

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Lifeline and Link Up Reform and Modernization) WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal) WC Docket No. 09-197
Service Support)
Connect America Fund) WC Docket No. 10-90
)
)
)

To: The Commission

COMMENTS OF COMCAST CORPORATION

Kathryn A. Zachem
Jordan B. Goldstein
Mary P. McManus
Regulatory Affairs

Lynn R. Charytan
Brian A. Rankin
Richard Chapkis
Beth Choroser
Legal Regulatory Affairs

COMCAST CORPORATION
300 New Jersey Avenue, NW, Suite 700
Washington, DC 20001
(202) 379-7134
(202) 379-7141

August 31, 2015

TABLE OF CONTENTS

EXECUTIVE SUMMARY	i
I. INTRODUCTION.....	1
II. DISCUSSION.....	7
A. The Commission Should Modernize, Streamline, and Simplify the Program to Encourage Broader Participation.....	7
1. Remove Providers from the Customer Eligibility Verification Process.....	7
2. Eliminate Provider Document Retention Requirements.....	9
3. Eliminate or Streamline the Provider Participation Criteria	9
B. Minimum Service Standards Should Not Interfere With Consumers’ Ability to Order the Services That Meet Their Needs.....	12
C. The Commission Must Ensure That Lifeline Operates Efficiently and Cost-Effectively.....	13
CONCLUSION.....	13

EXECUTIVE SUMMARY

The Internet is unparalleled in its ability to level the playing field and equalize access to education, health care, and vocational opportunities, as well as news, information, and entertainment. Yet, too many Americans still do not enjoy the benefits of broadband Internet access because they do not subscribe to – adopt – broadband Internet access. Comcast's experience with *Internet Essentials* confirms all the other broadband adoption research concluding that the bucket of digital relevance and digital literacy issues is the most important barrier to broadband adoption – and by a wide margin. The research consistently concludes that the cost of computer equipment and the cost of broadband service trail as barriers to broadband adoption. While reforms to the Lifeline program are appropriately focused on the affordability of broadband services for low-income consumers, Comcast's experience with Internet Essentials shows that closing the digital divide is critically dependent on a comprehensive approach that addresses all three of these barriers to broadband adoption, with an emphasis on digital literacy training.

Within that context, Comcast supports the Commission's efforts to reform Lifeline to support broadband. Comcast also agrees with the Commission that low-income consumers would benefit from greater provider participation in the Lifeline program. To achieve this goal, the Commission should simplify and streamline the rules for program entry and provider participation. In particular, the Commission should remove providers from the customer eligibility verification process. This could be accomplished by implementing a national third-party verifier, as the Commission proposes. The proposals for direct transfer of benefits or vouchers also warrant careful consideration. As providers are removed from the verification process, the Commission should eliminate associated document retention requirements. Provider participation criteria also should be simplified, either through a streamlined federal designation, or simply through elimination of the designation requirement altogether. Similarly, ongoing participation obligations should be minimized.

Increasing provider participation will help ensure that low-income consumers receive robust services. However, the Commission should not adopt Lifeline minimum service standards that place undue restrictions on Lifeline customers' ability to apply their Lifeline subsidy to the broadband plan that best meets their needs.

Finally, the Commission must ensure that Lifeline operates efficiently and cost-effectively. Although the Commission has made real progress in eliminating waste, fraud, and abuse, further steps are required. As noted above, removing providers from the eligibility verification process will eliminate incentives and opportunities for waste, fraud, and abuse. The program also must operate efficiently and cost-effectively, ensuring that the Fund as a whole does not impose an unreasonable burden on consumers.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Lifeline and Link Up Reform and Modernization) WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal) WC Docket No. 09-197
Service Support)
Connect America Fund) WC Docket No. 10-90
)
)
)
To: The Commission

COMMENTS OF COMCAST CORPORATION

Comcast Corporation files these comments in response to the Commission’s Further Notice of Proposed Rulemaking regarding further reform of the Lifeline program.¹

I. INTRODUCTION

The Internet is unparalleled in its ability to level the playing field and equalize access to education, health care, and vocational opportunities, as well as news, information, and entertainment. Since 1996, America’s broadband providers have invested over \$1.4 trillion in at risk private capital to deploy world-class broadband networks throughout the United States.² According to the Commission’s latest Broadband Progress Report, as of December 2013, 97 percent of American households had access to fixed broadband service at download speeds of 3 Mbps; 95 percent at download speed of 10 Mbps; and 84 percent at download speeds of 25

¹ *Lifeline and Link Up Reform and Modernization, et al.*, WC Docket Nos. 11-42 *et al.*, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order, FCC 15-71 (rel. June 22, 2015) (“NPRM”).

² USTelecom, “Broadband Investment,” available at <http://www.ustelecom.org/broadband-industry/broadband-industry-stats/investment>.

Mbps.³ Including wireless broadband, nearly 99 percent of American households currently have access to broadband services at download speeds of 10 Mbps or greater.⁴

Yet, despite the availability of these services, too many Americans still do not enjoy the benefits of broadband Internet access. According to a recent survey conducted by the Census Bureau, 73.4 percent of households subscribed to high speed Internet access at home in 2013.⁵ While home broadband adoption has continued to grow,⁶ certain populations are still in danger of being left behind, particularly those with lower incomes.⁷ In 2013, 92 percent of American households with incomes between \$100,000 and \$150,000 subscribed to a high-speed Internet connection.⁸ And nearly 95 percent of households with income of \$150,000 or more also

³ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps to Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, 2015 Broadband Progress Report and Notice of Inquiry on Immediate Action to Accelerate Deployment, 30 FCC Rcd 1375 ¶ 83, Chart 2 (2015).

⁴ National Broadband Map, “Broadband Statistics Report: Access to Broadband Technology by Speed” (Mar. 2015), available at <http://www.broadbandmap.gov/download/Technology%20by%20Speed.pdf>.

⁵ Thom File and Camille Ryan, *Computer and Internet Use in the United States: 2013*, American Community Survey Reports, U.S. Census Bureau (Nov. 2014), at 3, available at <http://www.census.gov/history/pdf/2013computeruse.pdf> (2013 ACS Report).

⁶ *Compare Exploring the Digital Nation: Embracing the Mobile Internet*, U.S. Department of Commerce, National Telecommunications and Information Administration (“NTIA”) (Oct. 2014) at 16, available at http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_embracing_the_mobile_internet_10162014.pdf (“NTIA 2014 Report”) and *Exploring the Digital Nation: America’s Emerging Online Experience*, NTIA (June 2013) at 26, available at http://www.ntia.doc.gov/files/ntia/publications/exploring_the_digital_nation_-_americas_emerging_online_experience.pdf (“NTIA 2013 Report”).

⁷ See Lee Rainie and D’Vera Cohn, *Census: Computer ownership, Internet connection varies widely across U.S.* (Sept. 19, 2014), available at <http://www.pewresearch.org/fact-tank/2014/09/19/census-computer-ownership-internet-connection-varies-widely-across-u-s/>.

⁸ 2013 ACS Report at 3.

subscribed. In contrast, households earning less than \$25,000 had half that rate with a high-speed Internet adoption rate of only 47 percent.⁹ Moreover, the digital divide disproportionately impacts households of color.¹⁰

The Internet has the power to create greater access to education, health care, employment, opportunities, news, information, and entertainment. But instead of leveling the playing field, because of the digital divide, the Internet could actually exacerbate the differences in opportunities available to those who access the Internet versus those who do not. In the critical area of education, Comcast strongly supported recent efforts to effectively update the E-rate program to foster high-speed broadband connections to and within our nation's classrooms and libraries. But to be effective and to accomplish objectives of true equality in broadband availability, there must be a continuum of broadband Internet connectivity – from the classroom to the community (in libraries and community computing centers) to the home. Otherwise, all Americans will not gain the full educational benefits of the Internet. Broadband at home enables students to get help with homework, submit assignments online, collaborate with fellow students after school, access Internet-based research materials, develop multimedia projects, and use the advanced features of digital textbooks.¹¹ Moreover, when students use broadband at home, parents are able to be more engaged in their child's learning process and kept up-to-date on educational challenges and accomplishments. Lack of Internet access by students across the

⁹ *Id.*

¹⁰ *Id.*

¹¹ *See, e.g.,* NPRM at 5-6; *The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs*, State Educational Technology Directors Association (2012) at 9, available at http://www.setda.org/wp-content/uploads/2013/09/The_Broadband_Imperative.pdf.

entire continuum of school, community, and home undermines our ability to prepare them for success in an increasingly competitive digital world.

For all these reasons, Comcast supports the Commission's efforts to transition Lifeline to support broadband services effectively. Comcast has been strongly focused on connecting low-income Americans to broadband – more focused than any other company in America.

Comcast's *Internet Essentials* program is the nation's largest and most comprehensive broadband adoption program. *Internet Essentials* offers students and their families in more than 48,000 schools and 5,000 school districts across Comcast's footprint the opportunity to access low-cost high-speed Internet service for \$9.95 a month, the option to purchase an Internet-ready computer for less than \$150, and multiple options to access free digital literacy training in print, online, and in person. In almost four years of operation, *Internet Essentials* has connected more than 500,000 households – or over 2 million low-income Americans – to the transformative power of the Internet at home.¹² This record is multiple orders of magnitude greater than all other private sector low-income broadband adoption programs *combined*.

Based on Comcast's own learnings, as well as feedback from customers and nonprofit and governmental partners, Comcast has made more than 25 key enhancements to the program since it began over four years ago, including extending the program indefinitely beyond Comcast's original three-year commitment. Such enhancements include increasing speed three times to 10 Mbps; expanding eligibility; providing amnesty to families who have a past due balance older than one year; and promoting and streamlining enrollment by, among other things, creating an instant approval process for families whose children attend schools where at least 50 percent of students are eligible for the National School Lunch program (20,000 schools in

¹² The program is showing strength in momentum as well. The number of enrollments during the first two quarters of 2015 has been the best in its history.

Comcast’s footprint now qualify for instant approval). In addition, Comcast recently announced that it is launching pilot programs designed to increase Internet adoption rates among low-income senior citizens.¹³

The experiences with *Internet Essentials* reveal certain key lessons. Most importantly, Comcast’s experience with *Internet Essentials* confirms all the other broadband adoption research concluding that the bucket of digital relevance and digital literacy issues is the most important barrier to broadband adoption – and by a wide margin. Researchers from the Commission, the National Telecommunications and Information Administration, the Pew Internet & American Life Project, and others have identified a bucket of digital literacy issues, including a perceived lack of relevance of the Internet, a lack of understanding as to the value or usefulness of the Internet, fear of the Internet, and lack of basic digital literacy skills, as the main barrier to broadband adoption in low-income communities.¹⁴ The research consistently concludes that the cost of computer equipment and the cost of broadband service trail as barriers to broadband adoption.¹⁵

¹³ “Comcast Announces Fifth Back-to-School Kick-Off for Internet Essentials,” Press Release (Aug. 4, 2015), available at <http://corporate.comcast.com/news-information/news-feed/comcast-announces-fifth-back-to-school-kickoff-for-internet-essentials>.

¹⁴ See, e.g., John B. Horrigan, Knight Foundation, *Adoption of Information & Communications Technologies in the United States: Narrowing Gaps, New Challenges* (Aug. 2013) at 8, available at http://www.knightfoundation.org/media/uploads/publication_pdfs/Knight_Digital_Access_Update_Feb2014.pdf (Horrigan - Knight Foundation Study); Kathryn Zickuhr, Pew Internet Project, *Who’s Not Online and Why* (Sept. 25, 2013), available at http://www.pewinternet.org/files/old-media/Files/Reports/2013/PIP_Offline%20adults_092513_PDF.pdf. The FCC previously has found that only 15% cited cost of Internet service as the main reason for non-adoption. John Horrigan, *National Broadband Plan: Broadband Adoption and Use in America*, OBI Working Paper No. 1 (2010), at 5.

¹⁵ As one survey-based study sponsored by the NTIA and conducted by two FCC economists and two analysts from Connected Nation reveals, about two-thirds of non-adopters would not consider subscribing to the Internet at home at any price. Octavian Carare (FCC), Chris

To tackle these issues, since 2011, Comcast has invested more than \$240 million in cash and in-kind support to help fund digital literacy training and education initiatives, reaching more than 3.2 million people through its national and local non-profit community partners.¹⁶ The success of *Internet Essentials* is due to its design as an integrated wrap-around solution that marries low-cost high-speed Internet access with training and education and access to a low-cost computer, and the reason that it is structured as a partnership between Comcast and thousands of school districts, libraries, elected officials, and nonprofit community partners.

While reforms to the Lifeline program are appropriately focused on cost of service for low-income consumers, and such reforms are discussed below, Comcast's experience with Internet Essentials shows that closing the digital divide is critically dependent on a comprehensive approach that addresses digital relevance and digital literacy, the cost of computing equipment, and the cost of broadband service.

McGovern (Connected Nation Inc.), Raquel Noriega (Connected Nation Inc.), and Jay A. Schwarz (FCC), *The Willingness to Pay for Broadband of Non-Adopters in the U.S.: Estimates from a Multi-State Survey*, Nov. 18, 2014, available at http://papers.ssrn.com/sol3/papers.cfm?abstract_id=2375867. Additional research by the NTIA has shown that nearly half of non-adopters say they don't need the Internet at home or are not interested. See Horrigan – Knight Foundation Study, at 23.

¹⁶ Dr. John Horrigan's second study of Internet Essentials customers examines the evolution of customers from non-adopters to adopters. Such longitudinal research has never been completed before. Perhaps the most striking finding of his report is that the real key to economic and personal empowerment through broadband adoption comes when you combine Internet access with formal training and education. For example, he found that those who received formal digital training – like the kind provided by non-profits through the Internet Essentials program – were 15 percentage points more likely to use the Internet to look for a job. John B. Horrigan, *Deepening Ties: Comcast Internet Essentials Customers Show Broader and Deeper Ties to the Internet Over Time — Especially Among Those Who Had Digital Literacy Skills Training* (Jan. 2015).

II. DISCUSSION

A. The Commission Should Modernize, Streamline, and Simplify the Program to Encourage Broader Participation

Comcast reiterates its support for modernizing the Lifeline program to support broadband. To that end, Comcast supports Lifeline reform that removes unnecessary regulation and simplifies program participation rules, avoids service specifications that would interfere with consumers' ability to order the services that best meets their needs, and ensures that Lifeline operates efficiently and cost-effectively.

Comcast supports the Commission's efforts to facilitate broader participation in the Lifeline program, particularly by companies with a proven track record for providing high-quality broadband and voice services in the consumer marketplace. Eligible consumers will benefit from the technical and operational expertise that established providers have gained in the consumer mass market, and the entry of more established providers, with offerings that have been tested in the marketplace, will obviate the need for government-specified service offerings.¹⁷

There are a number of steps the Commission can take to increase participation in the Lifeline program, including removing providers from or significantly streamlining the customer eligibility verification process, streamlining document retention requirements, and streamlining or eliminating the provider participation criteria, including the eligible telecommunications carrier ("ETC") designation.

1. Remove Providers from the Customer Eligibility Verification Process

The current requirement for Lifeline providers to verify the eligibility of prospective Lifeline customers (in the majority of states that have not implemented their own verification

¹⁷ See NPRM at ¶¶ 34-47.

process or coordinated enrollment) deters provider participation because it is costly and burdensome. Provider involvement in eligibility verification also increases the potential for waste, fraud, and abuse because it creates the opportunity for providers to enroll and receive reimbursement for ineligible customers. For both these reasons, Lifeline reform should eliminate provider responsibility for checking customer eligibility.

This could be accomplished, as the NPRM proposes, by establishing a national verifier that would perform the verification function in lieu of providers.¹⁸ Comcast agrees that moving this responsibility to a “trusted third party” would pave the way for more provider participation; reduce waste, fraud, and abuse; reduce duplicative administrative burdens; and bring greater confidentiality and dignity to the enrollment process for customers.¹⁹

A national third-party verifier holds the promise of creating a single, centralized interface for providers, which will greatly increase efficiency and reduce administrative costs. To further reduce costs, the national system should be automated to the extent possible. Where states have established their own eligibility verification systems, the national verifier should interact with them, so that the national verifier offers providers a single interface for verifying the eligibility of prospective Lifeline customers nationwide. This approach will retain the benefits of state efforts to implement eligibility verification while eliminating the burdens on providers of having to interface with multiple eligibility verification systems. Absent significant reduction in the costs and administrative burdens of the eligibility verification process, companies will continue to be deterred from participating in the program.

¹⁸ NPRM at ¶¶ 63-71.

¹⁹ NPRM at ¶ 63.

The proposals for direct transfer of benefits or vouchers for Lifeline also are consistent with relieving providers of the responsibility for the eligibility verification process, and would facilitate low-income consumers' ability to choose the broadband service offering that best meets their needs. Once their eligibility is verified by a national verifier, consumers could receive a direct transfer or voucher with the value of their subsidy to be used on the voice or broadband service offering of their choice. This approach also would facilitate greater provider participation in the program, because consumers would be able to use their Lifeline discount at any provider of their choosing.²⁰ Comcast believes that direct transfer or voucher-based proposals warrant careful consideration as these options would give consumers the flexibility to choose the supported service levels that meet their needs.

2. Eliminate Provider Document Retention Requirements

If the Commission proceeds as it should, to facilitate removal of providers from the eligibility verification process as discussed above, the associated document collection and retention requirements for providers would be rendered unnecessary and clearly should be eliminated. Elimination of the document retention requirements, in conjunction with centralized verification, will facilitate broader provider participation and hence make it more likely that low-income consumers have more choices of Lifeline providers.

3. Eliminate or Streamline the Provider Participation Criteria

As the Commission recognizes, requiring providers to undertake the regulatory burdens of full-blown ETC designation proceedings may be “an impediment to broader [provider] participation in the Lifeline program.”²¹ Comcast therefore supports consideration of “a new

²⁰ NPRM at ¶ 105.

²¹ NPRM at ¶ 132.

process applying to all entities that provide Lifeline service” as an alternative to standard ETC designation.²² Alternatively, the Commission should consider whether any designation process is necessary at all – particularly if the Commission transitions the program to a consumer-oriented direct-transfer approach. To reduce the burdens of participating in the Lifeline program, the Commission also should ensure that Lifeline providers are not saddled with unnecessary ongoing regulatory obligations.

The record in this proceeding includes extensive legal arguments, summarized and fleshed out in the NPRM, explaining why standard ETC designation is not necessary for the Lifeline program.²³ As the NPRM points out, Lifeline predated the universal service programs adopted under the auspices of the Telecommunications Act of 1996, was originally adopted under other authority, and was preserved by section 254(j).²⁴ Indeed, in the *First Universal Service Order*, the Commission concluded that it had the authority under other provisions of the Act “to extend Lifeline to include carriers other than eligible telecommunications carriers” but “decline[d] to do so at the present time.”²⁵ The Commission continues to possess the authority to do so. The Commission’s authority becomes even clearer as Lifeline transitions to support broadband, given “the Commission’s longstanding conclusion that broadband Internet access is

²² *Id.*

²³ NPRM at ¶¶ 133-36.

²⁴ *Id.*

²⁵ *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 8971 ¶ 369 (1997) (subsequent history omitted).

jurisdictionally interstate for regulatory purposes.”²⁶ Comcast, therefore, supports consideration of an alternative designation process, as discussed in the NPRM.²⁷

Comcast further urges the Commission to consider whether any particular designation should be required for provider participation in Lifeline. For example, no specific designation is required for providers to participate in the Commission’s E-rate program. A similar approach could make sense for Lifeline, so that any entity that provides the services supported by Lifeline would be able to accept the subsidy. Eliminating providers’ role in the eligibility process will remove the opportunities for fraud that have historically necessitated greater government oversight, and adoption of a direct transfer of benefits or voucher approach would further reduce the need for providers to have any special designation in order to provide the subsidized service. This approach would maximize the options available to low-income consumers, ensuring that their particular service needs will be met. For the same reasons that ETC designation itself is not necessary, there is no need for compliance plans or other entry roadblocks²⁸ – particularly for entities that have established themselves in the broadband and voice marketplaces outside of the Lifeline context.

In addition to streamlining the process for entry into the Lifeline market, greater participation also depends on ensuring that providers are not subject to overly burdensome ongoing regulatory requirements. The Commission should narrowly tailor any reporting requirements to eliminate all unnecessary burdens. For example, most of the reporting included in annual Lifeline provider reports (FCC Form 481) could be eliminated, particularly if carriers

²⁶ *Protecting and Promoting the Open Internet*, 30 FCC Rcd 5601, 5803 ¶ 431 (2015).

²⁷ NPRM at ¶ 137.

²⁸ NPRM at ¶ 127.

are no longer responsible for the eligibility verification process. While the Commission should not adopt minimum service levels that would undermine consumers' flexibility to choose the level of service that meets their needs, if the Commission nevertheless adopts such service levels, it should not subject providers to burdensome reporting to verify that their services meet these standards. Providers already report extensively on their offerings on FCC Form 477, and this information should be sufficient to determine that a given provider meets Lifeline standards. The Commission also should ensure that the provision of Lifeline service does not result in providers being subject to regulatory regimes to which they are not otherwise subject. For example, because broadband is an interstate service, broadband providers should not be subject to the prospect of disparate state regulatory regimes simply by virtue of serving Lifeline customers.²⁹

B. Minimum Service Standards Should Not Interfere With Consumers' Ability to Order the Services That Meet Their Needs

The Commission clearly has an interest in ensuring “the availability of robust services for low-income consumers.”³⁰ The best way to do this is to take the steps discussed above to encourage established service providers to participate in the Lifeline program. The Commission is also interested in bringing “much-needed dignity to the program” by ensuring that Lifeline customers are able to participate in the communications marketplace without stigma.³¹ The best way to achieve this objective is empower low-income consumers to use their Lifeline subsidy to

²⁹ Certain states may also implement state low income broadband programs with different eligibility requirements. Whether to participate in those programs should be determined by the provider, and satisfying state eligibility should not be a prerequisite for participating in the federal program.

³⁰ NPRM at ¶ 15.

³¹ NPRM at ¶¶ 66, 96.

purchase the level or combination of services that they need. In particular, providers should be permitted to offer Lifeline customers the plans they offer to non-Lifeline customers. If these plans meet the needs of the mass market, Lifeline customers also should have access to them using their Lifeline subsidies. Lifeline providers also should be encouraged to offer comprehensive wrap-around broadband adoption programs. For all these reasons, the Commission should not adopt Lifeline minimum service standards that place undue restrictions on Lifeline customers' ability to apply their Lifeline subsidy to the broadband plan that best meets their needs.

C. The Commission Must Ensure That Lifeline Operates Efficiently and Cost-Effectively

As the Commission further reforms the Lifeline program and prepares to expand it to broadband, it should – as with all USF programs – do so in a financially responsible, cost-effective manner with a clear focus on the fact that the Fund is financed by U.S. consumers. The Commission must ensure that the Lifeline program achieves its goals but also that the Fund taken as a whole does not impose an unreasonable burden on consumers. The Commission should continue to take steps to eliminate waste, fraud and abuse. Recent FCC actions have helped in this regard, but more needs to be done to protect the integrity of the program and the ratepayers who fund it. At minimum, as noted above, removing providers from the eligibility verification process will reduce waste, fraud, and abuse.³² The Commission should move forward with this reform without further delay.

CONCLUSION

Comcast urges the Commission to adopt further reforms to the Lifeline program consistent with these comments. While reforms to the Lifeline program are appropriately

³² See *supra* Section III.B.1.

focused on cost of service for low-income consumers, Comcast's experience with Internet Essentials shows that closing the digital divide is critically dependent on a comprehensive approach that addresses digital relevance and digital literacy, the cost of computing equipment, and the cost of broadband service. The Commission should encourage providers, along with all stakeholders, to offer comprehensive wrap-around broadband adoption programs that will help attack the digital divide in a meaningful way.

Respectfully submitted,

COMCAST CORPORATION

By: /s/ Kathryn A. Zachem
Kathryn A. Zachem
Jordan B. Goldstein
Mary P. McManus
Regulatory Affairs

Lynn R. Charytan
Brian A. Rankin
Richard Chapkis
Beth Choroser
Legal Regulatory Affairs

COMCAST CORPORATION
300 New Jersey Avenue, NW, Suite 700
Washington, DC 20001
(202) 379-7134
(202) 379-7124

August 31, 2015