

25. Comcast's unfair treatment of BFC placed BFC in a difficult and ultimately untenable financial posture. That led to disputes among the principals of BFC, which in turn led to a transaction by which InterMedia was to invest some \$10 million dollars into what remained of BFC.<sup>15</sup> The result: in 2007 GMC acquired significant elements of BFC's operation, resulting in the shut-down of BFC's cable network. (It reportedly planned to continue to provide Internet-delivered programming.) While the terms of the transaction were not disclosed publicly, at least one report indicated that Comcast was to have an equity interest in what remained of BFC.<sup>16</sup>

26. So, thanks in large part to discriminatory and anticompetitive treatment at the hands of Comcast (which unfair treatment favored a competing company of which Comcast was an owner), a 100% African American owned-and-operated video network was essentially taken over by a white-operated company, GMC, which is owned by another white-owned company, InterMedia. And Comcast apparently obtained an ownership interest in what remained of that network.

27. That alone demonstrates Comcast's deplorable track record with respect to 100% African American owned-and-operated program providers. But even worse, the same white-owned companies that benefited from that track record in 2007 – GMC and InterMedia – now again find themselves the beneficiaries of Comcast's largess. As demonstrated above, Aspire TV is little more than a *de facto* subsidiary of GMC (and, therefore, InterMedia). Not coincidentally,

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<http://apps.fcc.gov/ecfs/document/view;jsessionid=VjdmRDjB7wszJyV0RhDP1yVgyZvs3lM44bwJJQN4h6jn31XxVg5!638063854!NONE?id=7021025850>.

<sup>15</sup> See *James & Jackson LLC v. Holyfield et al.*, No. 2006CV124372, (Superior Court, Fulton County, Georgia) (Order on Motion for Summary Judgment, available at <http://readingroom.law.gsu.edu/cgi/viewcontent.cgi?article=1037&context=businesscourt>).

<sup>16</sup> See "Black Family Channel shutting down cable operation for move to the Internet", Target Market News (April 26, 2007) (<http://targetmarketnews.com/storyid04270702.htm>).

InterMedia reportedly owns a significant (33%) share of Aspire and is using Aspire as an outlet for programming to which it already owns the rights.

28. And to the very limited extent that Aspire TV might claim any identity separate and apart from GMC, Aspire TV is plainly at a tremendous disadvantage. After all, Aspire TV presumably is supposed to compete with GMC for audience and advertising, since the programming of both is targeted to the African American audience. But if GMC is in practical control of programming and advertising for Aspire TV, GMC has no incentive to promote Aspire TV effectively, because any success Aspire TV might achieve would come at the expense of GMC.

29. So the supposed success story of Aspire which Comcast has touted repeatedly in its annual reports to the Commission is, at best, misleading and, at worst, affirmatively misrepresentative. Indeed, it reflects a patent racial animus: recognizing the value of an authentically 100% African American-owned network, Comcast sought to acquire a significant ownership interest in BFC, only to be rebuffed. Rather than negotiate with BFC in a fair, arm's length manner, Comcast instead joined forces with a radio company operated by African Americans, Radio One, that was apparently willing to accede to Comcast's demands for an ownership interest, presumably in return for creating a new, partially Comcast-owned, network which would receive favorable treatment that would not be available to the 100% African American-owned company unwilling to cut Comcast in. Meanwhile, what remained of BFC was sold off to white owners to whom Comcast happily accorded carriage. And when supposedly forced by the Commission to provide carriage, on a fair and non-discriminatory basis, to an independently owned and operated company owned in whole or substantial part by African Americans, what did Comcast do? It relied on an arrangement that, in effect, benefits only

existing white-owned entities and, possibly, a single prominent African American apparently willing to serve as a front. Comcast's repeated choice of favoring the interests of itself or its white-owned friends over those of 100% African American-owned programmers reflects an astonishing and unacceptable racial animus.

30. In any event, Comcast's carriage of *Aspire* to satisfy (even in part) the Commission-imposed condition is plainly contrary to both the letter and the spirit of that condition.

#### *Revolt*

31. The only other supposedly independent African American network touted by Comcast in the five years since it voluntarily accepted the conditions is *Revolt*. As with *Aspire*, *Revolt*'s ownership structure is not publicly available, Comcast did not provide any detailed information about that structure, and the Commission didn't bother to ask about it. While the depth of readily available information about *Revolt* is considerably less than for *Aspire*, what information there is loudly echoes what we know about *Aspire*.

32. Comcast describes *Aspire* as “[s]pearheaded by Entrepreneur and NBA Hall of Famer Earvin “Magic” Johnson, in partnership with the Gospel Music Channel”. It similarly describes *Revolt* as “[p]roposed by superstar and entrepreneur Sean ‘Diddy’ Combs and MTV veteran Andy Schuon”. Again, nothing in that description (or elsewhere in Comcast's reports) provides any indication that *Revolt* complies with the terms of the condition: all we know is that a prominent African American personality is somehow involved. The other identified party – Andy Schuon, in the case of *Revolt* – is white, just as the other entity identified as to *Aspire* (*i.e.*, the Gospel Music Network) is white-owned. According to published reports, despite his own substantial financial assets, after putting up some undisclosed “starting finance”, Mr. Combs

eventually called on two white sources of funding, a “financial organization called Highbridge” and Ron Burkle.<sup>17</sup> The latter name should be familiar, because he was also identified as an investor in Aspire! And Highbridge? That would be Highbridge Principal Strategies (“Highbridge”) which, along with its subsidiary, HBRV Partners, holds an investment in Revolt. And Highbridge, in turn, is a subsidiary of Highbridge Capital Management, LLC, which in turn is owned by (and operates as a subsidiary of) J.P. Morgan Asset Management, part of the J.P. Morgan Chase & Co. (“Morgan”) operation – and sitting on the board of directors of Morgan is none other than Stephen Burke, who happens to be Chief Executive Officer of NBCU and a senior executive of Comcast (according to the Morgan website). And according to another published source, another “partial” owner of Revolt is ... Comcast itself.<sup>18</sup>

33. If Comcast does indeed own a piece of Revolt, that alone would violate the condition that the channels be “independent”. Such ownership would certainly be consistent with Comcast’s demonstrated *modus operandi*, as described above. Of course, the Commission currently has no way of knowing who owns what in Revolt, because the Commission has never asked. Making matters worse, the involvement of Mr. Burkle’s familiar face as well as the plainly-not-African American J.P. Morgan Asset Management underscores, again, Comcast’s apparent unwillingness to work with actual 100% African American-owned media companies. Instead, it appears to prefer to keep the enterprise all in the family, shared with a relatively limited universe of familiar, moneyed white people.

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<sup>17</sup> See “Diddy Is Now Worth \$780 Million”, The Coli (January 7, 2014) (<http://www.thecolli.com/threads/diddy-is-now-worth-780-muiiiion.179144/page-9>).

<sup>18</sup> See “Sean Combs’ Revolt TV Facing Trouble Thanks to Possible Comcast, Time Warner Merger”, Atlanta Black Star (September 19, 2014) (<http://atlantablackstar.com/2014/09/19/sean-combs-revolt-tv-facing-trouble-thanks-possible-comcast-time-warner-merger/>).

**DISCUSSION*****The inherent incredibility of Comcast's claims***

34. Comcast's claims concerning its carriage of independently-owned-and-operated networks owned wholly or substantially by African Americans are plainly bogus.<sup>19</sup> After five years, all Comcast can point to are two networks, both of which fall demonstrably short of the terms of the Commission-imposed condition that Comcast itself "voluntarily" consented to. Neither network can be said to be truly independent of Comcast: Aspire is obviously a front for GMC, which benefited from Comcast's mistreatment of BFC (as discussed above); Revolt is reportedly owned in part by Comcast and by a component of the J.P. Morgan companies, one of whose directors happens to be a senior Comcast executive. So much for independence.

35. Nor does the Commission have any reason to believe that either Aspire or Revolt is wholly or even substantially owned by African Americans: Comcast has provided no ownership information about either, no such information is easily available to the public, and published reports indicate that both are financed by substantial, white-owned sources. If the Commission's intent was to insure that Comcast would truly make carriage opportunities available to bona fide African American-owned and controlled entities – with the goal of providing new economic opportunities to entities historically deprived of precisely such opportunities – Comcast's actions make a mockery of that intent and that goal. In fact, all Comcast appears to have done is to provide lucrative financial opportunities to well-heeled, white-owned organizations, with two prominent token African Americans serving as window dressing and going along for the ride.

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<sup>19</sup> Petitioners are confident that precisely the same is true of Comcast's claims concerning Spanish language programming.

36. What is truly astonishing is Comcast's incredible pretense that Aspire and Revolt were the only two networks that might have satisfied the Commission's condition. First, of course, neither did satisfy that condition. And second, according to Comcast, it received "close to 100" proposals in response to its solicitations. Does the Commission seriously believe that, of those, the only two African American proposals that filled the bill were Aspire and Revolt? The Petitioners know for a fact that that was not the case, because ESI was one of those "close to 100" proponents. As described above, ESI is precisely the type of programmer contemplated by the Commission's condition: it is 100% owned, controlled and managed by an African American, and its already-available<sup>20</sup> content is unquestionably attractive, including multiple award-nominated and award-winning programs on eight different channels which can be seen on some of Comcast's biggest competitors (including, *e.g.*, AT&T U-verse, Verizon FIOS, and DirecTV).

37. How can Comcast explain passing over ESI, which clearly satisfies the Commission's condition, in favor of Aspire and Revolt, which equally clearly do not? The seemingly inexplicable nature of Comcast's selection process is more troubling in light of the fact that, even if Aspire and Revolt legitimately satisfied the condition, Comcast would *still* need to add two more African American channels to its line-up to fully satisfy the condition. That need has existed since the Commission's grant back in 2011. Throughout the five years since then, ESI has repeatedly sought carriage on Comcast's systems, and Comcast has repeatedly

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<sup>20</sup> Both Aspire and Revolt were start-up companies having no track record in programming and no existing inventory of programming – except, of course, for the 1970s vintage programming that white-owned InterMedia happened already to own the rights to, programming which it was presumably happy to provide to Aspire, of which InterMedia apparently owned a significant share and with which InterMedia was in any event a partner through GMC. The suggestion that two start-ups with no available programming could somehow have been deemed preferable to ESI is plainly misleading, if not fraudulent.

rebuffed ESI. Initially, Comcast feigned interest and suggested that carriage might be available at some future time, but over the years even those vague suggestions faded into nothingness, to be replaced by flat-out refusal even to speak with ESI representatives.

38. Nor is ESI's experience in this regard unique. To the contrary, the Petitioners have been advised that Las Vegas Entertainment and Sports Network, Inc. ("LVES"), another 100% African American-owned and operated video network, has for years been given essentially the same run-around by Comcast: vague quasi-promises to consider carriage of their networks, quasi-promises that invariably evaporate with no explanation. The Petitioners understand that the President of LVES – who happens to be a member of the Executive Committee of the Las Vegas chapter of NAACP – has concluded, based on Comcast's treatment of LVES, that 100% African American-owned media cannot get a fair shake from Comcast, notwithstanding Comcast's commitments in the MOU (to which the national NAACP was a signatory).

39. Comcast has never explained its unwillingness to engage in good faith negotiations for carriage arrangements with either ESI or LVES. In view of all the facts and circumstances described above, the Petitioners firmly believe that Comcast is engaging in racial discrimination. Recall the unfortunate history of BFC, a 100% African American-owned company that declined Comcast's overtures to become an investor. Carriage of BFC's programming on Comcast systems dwindled, but when that same programming shifted to white-owned GMC, it was greeted with open arms on Comcast's systems. And even now, rather than carry a wholly independent, 100% African American-owned channel targeting the African American family audience, Comcast instead concocts Aspire, which is nothing more than an offshoot of GMC, operated by GMC. The clear implication is that Comcast is willing to deal with African Americans only to the limited extent necessary to allow Comcast and its various

white-owned compatriots to take advantage of opportunities intended to flow to African Americans. That, in a word, is RACISM.

40. In this connection, it is relevant to note that this is not the only context in which Comcast has been accused of racial discrimination. For example, Comcast recently agreed to pay more than \$7 million in settlement of a lawsuit alleging racial discrimination against African American technicians. *See Brand et al. v. Comcast Corp. Inc.*, No. 1:11cv08471 (U.S. District Court for the Northern District of Illinois). While, in so doing, Comcast disclaimed any discriminatory behavior, its willingness to pay millions of dollars in settlement suggests that the claims were far from frivolous.

#### ***The Commission's Complicity***

41. Perhaps the most troubling aspect of this horrible tale is the Commission's regrettably culpable role. Whether intentionally or through benign neglect, the Commission has enabled and encouraged Comcast's misconduct. The Commission did not, after all, have to address the supposedly voluntary commitments set out in the MOUs; it could simply have acknowledged them and left it at that. But it didn't. Instead, the Commission affirmatively incorporated those commitments as conditions to its grant. Having done so, the Commission placed upon itself the obligation of meaningfully monitoring Comcast's performance to confirm that Comcast was, indeed, living up to its commitments.

42. The Commission has failed to meet that obligation.

43. Instead, the Commission has allowed Comcast to skate by with minimal showings that, even in their sparseness, establish that the conditions have not been met. The Commission's willful neglect in this regard makes it complicit in Comcast's misconduct. It is one thing for Comcast to discriminate in secret; it is an entirely different thing when that discrimination is

perpetrated under the guise of complying with the order of a federal agency. In the latter instance, a failure by the agency to throw the flag on the non-compliance serves as an imprimatur, a tacit approval of the ongoing misconduct.<sup>21</sup>

44. This is especially so when the Commission has available to it easy means to probe and test Comcast's conduct. To start, the Commission could have read Comcast's facile annual reports, noted that they did not provide sufficient detail to establish compliance, and insisted on the submission of detailed information concerning compliance. This the Commission has not done. Alternatively, the Commission could have undertaken its own informal investigation, much as the Petitioners have done. The Commission would thereby have presumably found the same information the Petitioners found, all of which points to Comcast's non-compliance. That, in turn, could have led to a formal investigation, through which the Commission could have examined the misconduct through its existing enforcement processes. This, too, the Commission has not done.

45. And even if the Commission, for some reason, were institutionally reluctant to insist on compliance with conditions which it had imposed, where has Commissioner Clyburn been for the past five years? It may be that she was duped by all the blue smoke and mirrors enveloping Comcast's application. But that would account only for her concurring vote; it would not account for her subsequent lack of vigilance. Commissioner Clyburn is the one who sternly

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<sup>21</sup> That failure sends a signal not only to Comcast but also to other entities contemplating massive mergers, a signal that a toothless MOU purporting to promote the interests of minority communities will be welcomed by the Commission as a supposed "public interest" factor, even if neither the Commission nor the merging parties ever seriously intend to implement the MOU. And sure enough, in its efforts to secure approval of its merger with Time Warner Cable and Bright House, Charter Communications has taken precisely that approach. *See* <http://www.broadcastingcable.com/news/washington/charter-strikes-memorandum-understanding-diversity-groups/147022>.

warned that, going forward *after* completion of the transaction, she would “be watching closely with my large megaphone in hand should these [MOUs] be ignored”. The MOUs *were* ignored, as the Commissioner could easily have determined through even minimal inquiry, much less the “watching closely” she promised. And yet, she has been totally silent, apparently on the assumption that sounding tough in her concurring statement was all she had to do. If her large megaphone were still (or ever) in her hand, it has yet to be used for anything other than helping to create the misimpression that Commissioner Clyburn might be seriously interested in identifying and remedying Comcast’s discriminatory practices.

#### CONCLUSION

46. When the Commission imposes conditions on a party, the Commission can and should expect, and require, compliance with those conditions. Indeed, it *must* require compliance if it wishes to claim legitimate regulatory authority: an authority that willingly allows its orders to be flouted is no authority at all. In the case of Comcast, the Commission has clearly fallen down. It has allowed Comcast to chart a course contrary to the purpose of the condition, a course that constitutes exclusionary racial discrimination when the Commission plainly contemplated inclusionary opportunities for, *inter alia*, African Americans.

47. This horrendous state of affairs should not be allowed to continue. In view of all of the above, the Petitioners submit that the Commission should immediately undertake a comprehensive, detailed investigation of Comcast’s purported compliance with the condition concerning carriage of programming provided by independent, 100% African American-owned media. In so doing, the Commission should require the submission of detailed information and documentation concerning, *inter alia*: the ownership and management structures of Aspire and Revolt; the “close to 100” proposals submitted to Comcast, all but four of which were rejected;

the review process through which Comcast selected Aspire and Revolt and rejected 90+ other proponents; and the process(es) which Comcast has since undertaken to identify additional 100% African American-owned sources of programming in fulfillment of the Commission's condition.

48. To the extent that, as a result of such investigation, the Commission determines that Comcast has failed to comply, then the Commission should require Comcast to take *immediate* corrective steps, subject to rigorous, continuous and ongoing Commission oversight. And to the extent that the investigation leads to the conclusion that Comcast has violated the conditions – including engaging in misrepresentation or lack of candor – the Commission should impose meaningful penalties on Comcast, penalties which could include the full range of possible sanctions, from monetary forfeiture to revocation or non-renewal of some or all of Comcast's licenses.

49. If Comcast is to be a Commission regulatee, it must behave like a regulatee, respecting the Commission's authority and complying with its rules and orders. Comcast has not done so to date; instead, it has cloaked itself in faux-compliance with the Commission-imposed condition and, in so doing, furthered its racially discriminatory practices. The Commission should not allow itself to be a party to such racial discrimination and fraud any longer.

Respectfully submitted,

/s/ Harry F. Cole  
Harry F. Cole

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Arlington, Virginia 22209  
(703) 812-0483  
cole@fhhlaw.com

*Counsel for the National Association of African  
American Owned Media and Entertainment  
Studios, Inc.*

March 24, 2016

**Attachment A**

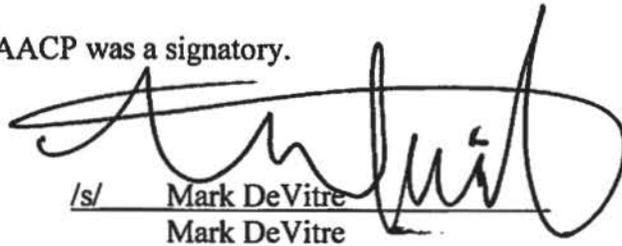
## DECLARATION

I, Mark DeVitre, hereby declare the following to be true and correct:

1. I am President of the National Association of African American Owned Media (“NAAAOM”). I am preparing this Declaration for submission to the Federal Communications Commission in connection with a Petition for Immediate Investigation and Imposition of Conditions, Monetary Forfeitures, Revocation and/or Non-Renewal of Licenses (“Petition”) being filed on behalf of NAAAOM and Entertainment Studios, Inc. (“ESI”) with respect to Comcast Corporation.
2. NAAAOM is an organization of voices across the communications and entertainment industries dedicated to fighting for economic inclusion, including equal access to distribution, investment capital, sponsorship, and other critical resources for 100% African American owned media. Its goal is the creation of sustained equal opportunities to communicate which can help rectify continued racial imbalances in the economy and society as a whole.
3. ESI is a fully integrated global media production and distribution company with eight networks of high definition programming, dozens of first-run syndicated shows (which have been nominated for (and won) Emmy Awards), over 5,000 hours of programming, a film distribution company, and a podcast network. It produces and distributes 38 syndicated television series. ESI is the largest independently owned and operated syndication producer/distributor for broadcast television programming. More importantly, ESI is 100% owned and controlled by Byron Allen, an African American, making ESI the only global media company of its size 100%-owned-and-managed by an African American individual. Mr. Allen began his career in entertainment as a stand-up comedian in the 1970s, became a television host and personality in the 1980s, and in 1993, formed ESI. ESI is a founding member of NAAAOM.

4. The representations set out in the Petition are based on research of publicly available sources undertaken by the Petitioners (or at their request).

5. Additionally, Petitioners have been advised that Las Vegas Entertainment and Sports Network, Inc. ("LVES"), another 100% African American-owned and operated video network, has for years been given essentially the same run-around by Comcast: vague quasi-promises to consider carriage of their networks, quasi-promises that invariably evaporate with no explanation. The Petitioners understand that the President of LVES – who happens to be a member of the Executive Committee of the Las Vegas chapter of NAACP – has concluded, based on Comcast's treatment of LVES, that 100% African American-owned media cannot get a fair shake from Comcast, notwithstanding Comcast's commitments in the Memorandum of Understanding to which the national NAACP was a signatory.

  
/s/ Mark DeVitre  
Mark DeVitre

Date: 3-24-2016

**Attachment B**



Brian P. Kemp  
 Secretary of State

OFFICE OF SECRETARY OF STATE  
 CORPORATIONS DIVISION

237 Coliseum Drive  
 Macon, Georgia 31217  
 (404) 856-2817

Registered agent, officer, entity status information via the Internet  
 sos.georgia.gov/corporations

APPLICATION FOR CERTIFICATE OF AUTHORITY  
 FOR FOREIGN LIMITED LIABILITY COMPANY

**IMPORTANT**

Remember to include your e-mail address when completing this transmittal form.

Providing your e-mail address allows us to notify you via e-mail when we receive your filing and when we take action on your filing. Please enter your e-mail address on the line below. Thank you.

E-Mail: wreeder@gmctv.tv

NOTICE TO APPLICANT: PRINT PLAINLY OR TYPE REMAINDER OF THIS FORM

1. Aspire Channel, LLC Limited Liability Company Name April 20, 2012 Date Business Commenced (Or Proposed) in Georgia (NOTE: If the date provided here is more than 30 days prior to the date the application is received by the Secretary of State, a \$500 penalty must be paid; penalty is statutory and cannot be waived by Secretary of State.)	Name Reservation Number (Optional)
2. Wm. (Wil), Esq. Name of filing person (certificate will be mailed to this person, at address below) 1514 East Cleveland Avenue, Suite 240 Address Atlanta City GA State 30344 Zip Code	770 692 9955 Telephone Number 2012/MAY - 7 ACCOUNTING RECEIVED PH 333
3. Delaware/USA Jurisdiction (Home state/country) February 1, 2012 Date of Organization in home state	
4. 1514 East Cleveland Avenue, Suite 240 Address of Principal Place of Business Atlanta City GA State 30344 Zip Code	
5. Charles E. Humbar Name of Registered Agent in Georgia 1514 East Cleveland Avenue, Suite 240 Registered Office Street Address in Georgia (Post office box or mail drop not acceptable for registered office address) Atlanta City Fulton County GA State 30344 Zip Code	
6. Eric Holoman, 9100 Wilshire Boulevard, 700 East Tower Manager's Name & Address (Person w/responsibility for maintaining records) Beverly Hills City CA State 90212 Zip Code	
7. 1514 East Cleveland Avenue, Suite 240 Address Where Limited Liability Company Records Are Maintained Atlanta City GA State 30344 Zip Code	
8. NOTICE: Mail or deliver an original and one copy of this form and the filing fee of \$226.00 to the Secretary of State at the above address. Filing fees are NON-refundable. This application is signed by a person duly authorized to sign such instruments by the laws of the jurisdiction under which the foreign limited liability company is organized. The foreign limited liability company undertakes to keep its records at the address shown in #7 above until its registration in Georgia is canceled or withdrawn. The foreign limited liability company, in accordance with Title 14 of the Official Code of Georgia Annotated, appoints the Secretary of State as agent for service of process if no agent has been appointed in Georgia or, if appointed, the agent's authority has been revoked or the agent cannot be found or served by the exercise of reasonable diligence.	
Authorized Signature  Req	5/3/12  http://www.georgiacorporations.org





May 4, 2012

Via First Class U.S. Mail

Office of Secretary of State  
Corporations Division  
237 Coliseum Drive  
Macon, GA 31217

Re: -Application for Certificate of Authority for Foreign Limited Liability Company

To Whom It May Concern:

Enclosed please find the filing fee and an original and one copy of the Application for Certificate of Authority for Foreign Limited Liability Company for Aspire Chanel, LLC.

If you have any questions or concerns please feel free to contact me.

Sincerely,

Wm. (Wil) Reeder, Esq.  
Consultant  
Business and Legal Affairs

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**CERTIFICATE OF SERVICE**

I, Harry F. Cole, hereby certify that, on this 24th day of March, 2016, I have caused copies of the foregoing "Petition for Immediate Investigation and Imposition of Conditions, Monetary Forfeitures, Revocation and/or Non-Renewal of Licenses" to be sent by electronic mail or placed in the U.S. mail, first class postage prepaid (as indicated below), addressed to the following:

The Honorable Tom Wheeler, Chairman  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
(By email – Tom.Wheeler@fcc.gov)

The Honorable Michael O'Rielly, Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
(By email – mike.o'rielly@fcc.gov)

The Honorable Mignon Clyburn, Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
(By email – Mignon.Clyburn@fcc.gov)

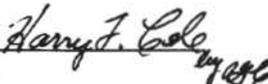
Jonathan B. Sallet, General Counsel  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
(By email – Jonathan.Sallet@fcc.gov)

The Honorable Jessica Rosenworcel,  
Commissioner  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554  
(By email – Jessica.Rosenworcel@fcc.gov)

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Jessica F. Greffenius, Esquire  
Willkie, Farr & Gallagher, LLP  
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*Counsel for Comcast Corporation*  
(By first class mail)

The Honorable Ajit Pai, Commissioner  
Federal Communications Commission  
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Kathryn A. Zachem  
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Ryan G. Wallach  
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Comcast Corporation  
300 New Jersey Avenue, N.W., Suite 700  
Washington, D.C. 20001  
(By first class mail)

/s/ Harry F. Cole   
Harry F. Cole