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August 20, 2002

Ex Parte Communication

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: Applications for Consent to the Transfer of Control of Licenses from Comcast Corporation and AT&T Corp., Transferors, to AT&T Comcast Corporation, Transferee, MB Docket No. 02-70

Dear Ms Dortch:

On behalf of Comcast Corporation, and in response to questions raised by Commission staff, the following paragraphs provide additional information regarding plans for the post-merger offering of telephone services in Philadelphia and Detroit.

Comcast envisions that the phone services that will be offered to one million homes in Philadelphia and Detroit as a result of the merger with AT&T Broadband will be directly competitive with the local telephone services offered by incumbent local exchange carriers. They will have comparable characteristics (*e.g.*, reliability) and features (*e.g.*, access to emergency services). To the extent that the services lack the line-powering (DC current) that is typical when telephone services are delivered over telephone twisted pair, they will instead have battery back-up to ensure continued service in the event of a power outage.

Over the near-term, Comcast currently expects that much of the phone service that it offers in Detroit will use conventional circuit switching (although Detroit will be using the GR303 solution for IP in the access network, it will connect to Comcast's Class 5 circuit switch; as explained in our answer to question G.8. of the Bureau's request for supplemental information, Comcast conducted trials using this approach from September 2001 until June 2002, and it is now part of our standard commercial operations there). As reflected in the press releases we placed in the record on July 26, Comcast is planning to introduce IP phone service in a portion of the Philadelphia market in the second quarter of 2003. Steve Burke, President of Comcast Cable, stated in an earnings call on August 1 that this will be a "roll-out," not a test, in the Western Philadelphia suburbs. Additional decisions on these matters will depend on

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experience; as Mr. Burke said, “we want to make sure that IP is a robust alternative when the time comes.”

Comcast currently offers its cable and Internet services on a stand-alone basis and expects to do the same, post-merger, with its phone service as well. AT&T Comcast may well offer customers the *option* of purchasing bundles of services, but this will not prevent customers that wish to procure only a single service from doing so, so long as they are within the areas served by our network (in most franchise areas, this is effectively 100% of homes).

We hope this additional information is helpful. Please contact us if you have any additional questions.

Sincerely,

James L. Casserly

cc: Roger Holberg
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